

Strategic Risk Register @ December 2025

Our Strategic Themes



Risk Ref	Risk Title and Description	Previous score (August 2025)	Movement in risk score	Current risk score (December 2025)	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)
1	Children's Social Care Following the recent Ofsted inspection and outcome, if the Council does not maintain robust arrangements and continue to receive appropriate assurances to ensure that the Sandwell Children's Trust (SCT) continues its performance, then the Council will fail in its responsibilities to: <ul style="list-style-type: none"> Safeguard vulnerable children Continue to 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 to further improve the Council's reputation for children's social care as currently demonstrated by the ILACS inspection. If the Council is unable to procure children's social care services from SCT in exchange for an affordable and sustainable contract sum, there is a risk of destabilising the Council's MTFS Risk Area – Children's Services Risk Owner – Sally Giles, Director of Children and Education Cabinet Member: Councillor Jalal Uddin Strategic themes impacted: 1 and 2	8 (amber)		4 (green) Good	4 (green) Good	<p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> Performance and contract management against KPIs and the improvement plan. KPI's are reviewed monthly via the contractual Operational Partnership Board and quarterly at the Strategic Partnership Board, they are also reported to Cabinet via the quarterly performance reporting framework Completion of case file audits and learning from the audit is used to ensure practice improvement. Ongoing measures to improve staffing levels and recruitment via the development of a workforce strategy and market supplements. Benchmarking of children's social care costs against statistical neighbours has demonstrated that the Council's expenditure in this area is reasonable and lower than average. Benchmarking will continue to take place <p>Further Actions</p> <ul style="list-style-type: none"> The Inspection of Local Authority Children's Services (ILACS) took place in October 2025, with the final report published on 2 Dec 2025. Children's social care services were judged as being Good. There were four recommendations arising from the inspection and the Trust will be required to submit a plan to Ofsted on how these recommendations will be addressed. The Council will receive a copy of the plan and will monitor its implementation via the existing contractual mechanisms. The Ofsted inspection of adoption services, commissioned through the RAA, and delivered by the Trust rated all areas as 'Good' following inspection in December 2022. OFSTED undertook an inspection of the Fostering Service in October 2024. It was again judged as 'Good', this was following a previous judgement of 'good' in August 2021 An Independent third party has undertaken work to assess opportunities for the Trust to make savings, some of which the Trust has already identified, the Council will monitor the implementation of these. The third party has been further commissioned to work with the Trust to implement changes in how placements are commissioned to realise further savings/avoid cost increases. <p>Since taking over responsibility for the delivery of social care services in 2018 there has been a gradual but significant improvement in services. The Fostering service moved from inadequate to, requires improvement to being judged as good in the last two inspections. The adoption service is also judged as good.</p>	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 ILACS Ofsted inspection – October 2025 Other Ofsted monitoring and focussed visits DfE improvement Board (independently chaired by a DfE consultant) Independent Reviewing Officer function SCT external audit report LG Futures benchmarking exercise Informal meeting between senior officers from both the Council and Trust
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	8 (amber)		8 (amber) Achieved	8 (amber) Achieved	<p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> Services are reminded on a quarterly basis to ensure their business continuity plans are up to date 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. Service workshops with a focus on ICT to improve business continuity planning, led by the Resilience Team and supported by ICT, held with 5 services and one with a Directorate senior management team in 2024-25. Workshops continue to be offered to services in 2025-26. No workshops held in Q1 or Q2 25/26. National Power Outage exercise held in July 2025 to build senior officer understanding of the Council's response to the failure of the National Electricity Transmission System (NETS). National Pandemic Exercise Pegasus held in Autumn 2025 tested Council response to the first 8 weeks of a global pandemic. Incident Management Teams and multi-agency arrangements stood up across 3 phases with briefings into SLT with BCP update. Local and multi-agency debriefs held. Learning to be included in local Pandemic Plan being reviewed by Public Health. <p>Further Actions</p> <ul style="list-style-type: none"> Services to arrange business continuity workshops and take up offer from Resilience Team to support. Public Health workshop to be scheduled when plan review completed. ICT Disaster Recovery workshops ongoing and 'surprise test' run has taken place, identifying that further works required but the Disaster Recovery plan is forming well. 	1st line Review program of emergency plans Service business continuity plan register and monitoring Post incident reports Test exercises including cyber exercise 2nd line Resilience Team reports to Leadership Team 3rd Line Audit and Risk Assurance Committee

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	<p>Risk owner – Alan Lunt, Executive Director – Place Cabinet Member: Cllr Kerrie Carmichael</p> <p>Strategic themes impacted: All</p>					<ul style="list-style-type: none"> • Sandwell Council National Power Outage framework to be developed in Q1 26/27 to detail response to system-wide catastrophic incident. • Exercise Pegasus Phase 4 on Pandemic recovery to be held in Summer 2026. <p>This risk is linked to, and supports, the Emergency Planning risk held at Directorate level that ensures effective arrangements are in place to plan and mitigate against national, regional, or local emergencies as defined by Part 1 of the Civil Contingencies Act 2004. Current controls include:</p> <ul style="list-style-type: none"> • Participation in the West Midlands Local Resilience Forum (LRF) • Contribution to the Community Risk Register that informs the capabilities and plans required of partners. • Emergency Plans in place for identified risks that are continually reviewed with a training, testing and exercise programme approved by the Leadership Team. 	
3	<p>Compliance with the Data Protection Act 2018 (DPA 2018), the General Data Protection Regulations (GDPR) and Freedom of Information Act 2000 (FOIA)</p> <p>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 expose the Council to significant external action, including fines, from the Information Commissioner's Office for failing to undertake its statutory duty.</p> <p>Further, failing to comply could result in negative public reaction and reputational damage, significant resourcing to correct issues. There could also be monetary penalties, loss of confidential data and potentially legal action.</p> <p>Risk Area – Finance and Transformation</p> <p>Risk Owner- Mike Jones, Service Director - Governance</p> <p>Cabinet Member: Councillor Paul Moore</p> <p>Strategic themes impacted: All</p>	8 amber		8 amber	8 (amber) Achieved	<p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> • 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 2024. Cyclical review commenced of existing policy and procedure suite. Phased programme will see reports to Information Governance Board (IGB). • 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 2025 was completed in July with 'standards met'. • Annual mandatory data protection and cyber security training is entrained for all staff. • GDPR training undertaken with elected members during July-December 2025. Reminder communications issued on compliance. Sessions programmed for inclusion in induction following all out elections in May 2026. • Compliance with the Council's data retention policy, which is reviewed regularly. • 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 latest statistics show that compliance continues to improve. The measures put in place 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. • Additional assurance gateways to verify sources of information in responses prior to final review and authorisation. Dual step notification of relevant Executive Directors/Service Directors and Communications pre-publication to ensure full awareness and input into final responses when assessed as strategic. • 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. • New policies and guidance approved enabling use of WhatsApp and Artificial Intelligence (AI). <p>Further Actions</p> <ul style="list-style-type: none"> • Dialogue restarted with ACE Directorate to explore options for integrated customer feedback system with full functionality for management of FOIA/SAR/EIR requests with appropriate ringfence and restriction controls. Discussions at early stage and will require full business case, evaluation, approval gateways, procurement and mobilisation. 12 month window from November 2025 Adjustments and reconfiguration of existing DASH system to enhance operation and effectiveness. • The Monitoring Officer is undertaking a review of all practices, procedures and policies to ensure best practice is embedded to underpin assurance of compliance frameworks for IG. Programme in place for 12 months from October 2025. • Further improvement is still necessary in response times of FOI requests, disclosure requests and SARs, with a target of 95% compliance which continues to impact on the current risk rating. Sustained performance of above 80% required over two quarters. Re-assess if current interventions do not stabilise by March 2026. • Further improvement required in corporate compliance with disclosure requests and SARs. Refresh of existing training and guidance materials in progress, updates cascaded through IGB. • Development of pro-active publication website to expand beyond disclosure log for FOIA to pre-emptively publish information of public interest prior to request, to improve transparency and reduce volumes of FOIA requests. Pilots to run from February to June 2026. • Review of IGB initiated to shift to a more strategic role with operational workstreams reporting in. Report due January 2026 • Development of Improvement Plan to address plateauing performance in IG targets and areas of entrenched lower performance. December 2025. <p>Compliance and performance rates are subject to ongoing review with additional support and intervention offered to service areas or directorates should performance fall below an 80% threshold of compliance. It is not anticipated that the level of risk will subside further below an amber rating as sustained performance and compliance is required which can be impacted by operational and legislative factors and remains subject to ongoing close oversight and intervention as required to assure performance is maintained.</p>	<p>1st line Information Champions Data Protection Officer Information asset registers Information incident log</p> <p>2nd line Information Governance Board Performance data on compliance with FOI and SAR responses to Leadership Team and directors FOIA disclosure log</p> <p>3rd line Information Commissioner's Office Internal Audit reviews First Tier Tribunal decisions</p>

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4	Cyber Security <p>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:</p> <ul style="list-style-type: none"> 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 <p>Additionally, the Council will be:</p> <ul style="list-style-type: none"> Unable to meet sector defined standards and compliance for cyber resilience e.g. PSN, CAF, PCI-DSS Unable to share and collaborate with partner organisations in a joined-up manner as the Council will not be viewed as a trusted partner <p>Risk Area – Finance and Transformation Risk Owner – Alex Thompson, Executive Director of Finance and Transformation Cabinet Member: Councillor Kerrie Carmichael, Leader of the Council Strategic themes impacted: All</p>	9 amber		9 amber	9 amber (Due to the ever-changing Cyber risk landscape this is unlikely to ever be green and will remain amber)	<p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> Technical Security Controls: The Council maintains a suite of technical controls to protect its network perimeter and information assets, including firewalls, endpoint protection, and secure configurations. Vulnerability Management: Regular vulnerability scanning is conducted to identify and remediate weaknesses across the ICT estate, supported by curated threat intelligence feeds to stay ahead of emerging risks. Annual Health Checks and Penetration Testing: Independent ICT Health Checks and penetration tests are carried out annually to validate the effectiveness of security controls and identify areas for improvement. Incident Response Playbooks: Cyber incident playbooks are maintained and regularly reviewed to ensure readiness for a range of threat scenarios, enabling swift and coordinated responses. Cyber Awareness and Training: All staff are required to complete annual cyber security training. This is reinforced through regular internal communications that raise awareness of phishing, social engineering, and other threats. Information Governance Collaboration: The ICT Service works closely with the Council's Information Governance Team to ensure a holistic approach to information protection and compliance with data protection standards. Technology Lifecycle Management: An ongoing programme is in place to retire and replace obsolete or unsupported technology platforms, reducing exposure to known vulnerabilities. Security Tooling via Microsoft E5: The uplift to Microsoft E5 licensing has enabled the deployment of advanced security and compliance tools, including Defender for Endpoint and Microsoft Purview. Budget Reprofiling and Oversight: Cyber budgets have been reprofiled to address identified pressures, ensuring that funding is directed towards priority areas of risk mitigation and resilience. Cyber Governance and Assurance: The ICT team have engaged Phoenix and Rubrik to assist in the delivery of Governance, Risk and Compliance (GRC) services, including Cyber Essentials Plus, CAF and CIS gap analyses, and the development of Cyber Incident Response Plans. These efforts will align with the Council's broader digital assurance framework. Expansion of 24/7 SOC Services: ICT extended its partnership with Phoenix Software to evolve the current Security Operations Centre (SOC) into a virtual cyber team. This team provides continuous 24/7 monitoring, threat detection, and incident response capabilities, enhancing real-time defence against cyber threats. Rubrik-Based Data Security Implementation: A new backup and data security solution has been implemented and went live in October 2025 using Rubrik. This hybrid solution will secure on-premise, cloud, and M365 data, with a focus on rapid recovery, ransomware resilience, and clear RTO/RPO metrics. Mandatory Multifactor Authentication (MFA) Rollout: A mandatory Multi-Factor Authentication (MFA) campaign was launched with 95% compliance. This will significantly reduce the risk of credential-based attacks. <p>Further actions</p> <ul style="list-style-type: none"> Cyber Security Leadership and Governance: A Cyber Security Lead will be recruited and in role by Feb 2026 to manage the SOC service and provide strategic oversight of cyber security, patching, and resilience activities. This role will also support compliance with PSN, CAF, and PCI-DSS standards. Mandatory Multifactor Authentication (MFA) Rollout: Mop up of remaining 5% of users re mandatory Multi-Factor Authentication (MFA). Enterprise Security Assessment: A comprehensive security assessment will be conducted with Microsoft to identify vulnerabilities and prioritise remediation actions. By end of Q1 2026. Strategic Risk Alignment: Cyber risk reporting will be aligned across Sandwell MBC and Sandwell Children's Trust, ensuring consistency in risk registers and assurance statements for audit committees. We will also create a dedicated Cyber Resilience Governance Board providing oversight of cyber-related initiatives and ensuring alignment with corporate risk and assurance frameworks. <p>Looking to exercise the risk management module in our HoTh case management tool across both SMBC and SCT rather than use excel sheets and word documents</p> <ul style="list-style-type: none"> Appoint an interim Cyber Security Lead by Feb 2026 Complete PSN resubmission and PCI-DSS improvement programme by February 2026. Continue participation in the Get CAF Ready programme into 2026. Explore LGA Cyber 360 review and Business Continuity Reaction Exercise. 	<p>1st line Strategic partnership with Phoenix Software for SOC and GRC services. Microsoft Sentinel and Defender for Endpoint deployments. Cyber Essentials Plus and CIS gap analysis underway. Rubrik implementation for cyber recovery assurance. Mandatory MFA enforcement programme.</p> <p>2nd line Cyber governance board oversight and alignment with national frameworks (CAF, PSN, PCI-DSS).</p> <p>3rd line Enterprise Security Assessment by Microsoft. LGA Cyber Assessment NHS Digital PSN certification Audit and Risk Assurance Committee risk review</p>
5	Regeneration Fund Programmes <p>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</p>	6 (green)		6 (green)	4 (green) Programme completion of all projects and delivery of intended outcomes	<p>This risk sets out the next phase of the Regeneration Fund Programmes.</p> <p>Towns Fund (approval received by the Council for all 16 business cases that were submitted as part of the approved TIPs).</p> <p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> 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 funding. The Service Director – Economy and Regeneration chairs a Towns Fund Programme Board (which is also attended by the Director of Finance/ representative and officers from procurement and legal as well as all project leads) to review risks and provide a forum for resolution of issues, as well as seeking assurances on the management of risk. Fortnightly engagement with advisors from MHCLG 	<p>1st line Town Deal Boards</p> <p>2nd line Scrutiny Reviews Monitoring and reporting of outcome indicators, with processes in place to manage changes and risks during delivery stage.</p>

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	<p>sustainable economic growth and create long term economic prosperity and also reputational harm to the Council.</p> <p>Risk area- Place Risk owner – Alan Lunt, Executive Director – Place Cabinet Member: Councillor Peter Hughes Strategic themes impacted: 2 and 4</p>					<ul style="list-style-type: none"> 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. <p>Further Actions</p> <ul style="list-style-type: none"> Ongoing implementation of delivery phase of projects and programme plan. Ongoing reviews of financial profiles to manage supply chain issues and implications of cost inflation. <p>Levelling Up Partnership</p> <p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> Robust governance 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 Service Director – Economy and Regeneration Chairs a LUP Programme Board (which is also attended by representatives from Finance, procurement, and legal as well as all project leads) to review risks and provide a forum for resolution of issues, as well as seeking assurances on the management of risk. Monthly engagement with advisors from MHCLG. Programme management arrangements in place including appointment of a temporary programme manager to oversee the delivery phase and a programme support officer. Programme and project risk registers are in place. Reporting to Leadership Team Quarterly. All LUP projects have undergone a capital appraisal as part of the Council's assurance processes and have been approved subject to recommendations. Agreement in place with MHCLG for the Council to manage the grant within the Council's overall capital programme to enable spend beyond the March 2025 grant deadline. Finance have confirmed sufficient capacity within the Council's capital programme (via swaps) to accommodate spend post March 2025. A Developer Partner has been appointed for the Friar Park development to enable progression. <p>Further Actions</p> <ul style="list-style-type: none"> Implement delivery phase of projects and programme plan. Ongoing reviews of financial profiles to manage supply chain issues and implications of cost inflation. Agree remediation and permitting strategy for Friar Park development with Environment Agency by July 2026 – recognising timescales for decision making are not fully in control of the Local Authority. Commence planning process in relation to Friar Park remediation by April 2026 	<p>3rd line Ministry of Housing, Communities and Local Government (MHCLG)</p> <p>Internal Audit review- Levelling up partnership and Towns Fund- Substantial assurance</p>
7	<p>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.</p> <p>Risk area – All Council Services Risk owner – James McLaughlin, Assistant Chief Executive Cabinet Member: Councillor Kerrie Carmichael, Leader of the Council Strategic themes impacted: All</p>	8 (amber)		6 (green)	6 (green)	<p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> Six staff networks (Age Smart, Disability, Ethnic Minority, Frontline Workers, LGBTQ+ and Women) have been established and SLT 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. Equality impact assessment toolkit and guidance was 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 Equalities Calendar has been developed and implemented that details many EDI events to raise awareness of the agenda. Various events (One Council Fast Challenge & Grand Iftar for Ramadan in March, Vaisakhi celebration in April, Black History Month and Diwali celebration in October, and Islamophobia Awareness Month in November) have been successfully delivered leading to improved awareness and understanding. Refresh of the Council's Equality Objective was published in March 2023 An EDI Audit based on the LGA 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. EDI Strategy approved by Cabinet in November 2025, based on the LGA Equality Framework EDI function has been located with HR ensuring connectivity between EDI Strategy and People Strategy (from November 2025) <p>Further actions</p> <ul style="list-style-type: none"> New governance arrangements for Member Steering Group, chaired by Leader and made up of Town Leads, and EDI Internal Taskforce, chaired by ACE – expected to be implemented by February 2026, subject to SLT review Review of translation services across the authority – by May 2026 Review against PSED to demonstrate compliance – by June 2026 Update of Equality Policy and Equality Objective – by June 2026 	<p>1st line Employee Engagement Survey 2022</p> <p>2nd line Sandwell Equalities Commission</p> <p>3rd line LGA Peer Review</p>
8	<p>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:</p> <ul style="list-style-type: none"> reputational damage financial impact 	9 (amber)		9 (amber)	8 (amber) 2025 - Update Action Plan Monitoring Tool and provide GAP analysis 2025 – Review and update Climate Change Strategy and	<p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> Climate Change strategy 2020-2041 in place which sets out the 2030 target for the Council. Member steering group to oversee 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 monitor the implementation of the action plan, A Climate Change Programme Board (represented by service managers from across the Council) is leading on measures within the action plan. Action plan monitoring tool has been established following an internal audit report. This document is owned by the Climate Change Team and is reviewed 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. Implementation of the Asset Management Strategy approved by Cabinet in November 2022 which seeks to significantly rationalise the Council's buildings and assets. 	<p>1st line Climate Change Strategy 2020-2042 Climate Change Improvement Plan</p> <p>2nd line Climate Change Programme Board Member Steering Group</p> <p>3rd line 2023 Internal Audit Report – Limited Assurance</p>

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	<ul style="list-style-type: none"> increased demand for Council resources (in the event of extreme weather) and a loss in public confidence. <p>In addition, managing the effects of climate change will also have significant financial impact which the Council will need to address.</p> <p>Risk Area – All Services Risk Owner – Alan Lunt, Executive Director – Place Cabinet Member: Councillor Keith Allcock Strategic themes impacted: All</p>				Action Plan along with updating board membership / Terms of Reference 2030 – Target date for Council to become Net Zero	<ul style="list-style-type: none"> Single Use Plastics policy that is consistent with the national policy has been presented to Leadership Team and Cabinet Members and approved at Cabinet in January 2024 and is now adopted. Carbon Literacy Training provided for elected Members, relevant officers and Climate Change Champions. Refresh of the Climate Change Board and Terms of Reference has now been undertaken having been presented to Leadership Team in 2024. Transition of household waste collections to Alternate Weekly Collections (AWC) and dual-stream recycling to improve the borough's recycling rate and reduce the amount of waste sent for incineration. Implemented in September 2025. Consideration of adapting works and activities to ensure that contractor selection, works methods and materials used are aligned and contribute to the climate change strategy. This is embedded as part of contract specifications as part of the procurement process. The business case for new and replacement fleet vehicles will provide zero-emissions vehicles by default within affordability, technological and infrastructural limitations. <p>Further Actions</p> <ul style="list-style-type: none"> Gap analysis was previously conducted to assess the Council's ability to implement the action plan, followed by a report on available options in 2024/25. This has since been superseded and this will now be addressed as part of the refreshed Climate Change Board and update of the Climate Change Strategy and Action Plan due to be undertaken in 2026. 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 investment. This is currently a budget pressure risk. December 2026 Explore funding models for retrofit of Council and other homes in the Borough e.g. attend MIPIM investors conference / WMCA Devolution Deal with Government in negotiation. March 2026 To establish EV charging infrastructure via ULEV programme (on street) and Council operational locations so that relevant Council fleet can transition to EV over the next 3 years – in progress. Climate Change Strategy and Action Plan to be updated. Public consultation due to be undertaken in early 2026, with new strategy to be presented to Cabinet by end of Q2 2026/27 <p>The delivery of the action plan is the key measure that determines the current risk assessment. The deliverability of the Plan is heavily dependent upon future government initiatives and the availability of financial resources which will be the key driver in achieving the Council's 2030 target.</p>	
9	<p>Workforce Recruitment The Council is required to recruit a skilled, qualified and experienced workforce in order to provide and deliver services to Sandwell residents. If the Council is unable to recruit 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.</p> <p>Risk area – All Council services Risk owner – James McLaughlin, Assistant Chief Executive Cabinet Member: Councillor Paul Moore Strategic themes impacted: All</p>	6 (green)		6 (green)	4 (green)	<p>The risk concerns issues were 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 was put back in order to allow the recruitment strategy to be agreed and fully embedded, and until results over the mid-term were known.</p> <p>Current and Ongoing Controls:</p> <ul style="list-style-type: none"> Adoption of People Strategy, values 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 microsite (We Are Sandwell) has been launched, is consistent with corporate branding approach to maximise impact on candidate attraction and is linked to the LGA recruitment campaign. Directorates to continue to undertake comprehensive workforce planning at least annually, as part of business planning processes, with a focus on creating and nurturing 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 121 meetings (supervision) and annual appraisal process is in place to ensure employees are engaged and can raise any concerns. Council tested its own compliance with Annual Reviews and 121s in place during May and June for SLT review. Regular employment engagement (full) and pulse surveys are undertaken, and plans are developed and implemented to address any areas requiring further action. Resourcing Team active engagement in regional and wider attraction campaigns. NGDP Graduates undertaking project to review how the Council can become an 'employer of choice' for young people Introduce and extend talent pools and open-ended recruitment campaigns to high turnover areas - this will form part of the recruitment strategy which is underway. Review and extend advertising, to include focus on attraction of diverse applicants – again this will form part of the recruitment strategy. Review of our long-term use of a neutral vendor agency provision where we are unable to fill roles to deliver a service to our residents. Delivered an Apprenticeship Recruitment campaign for 100 new entrant apprenticeships – originally to be delivered by 2027, now to be delivered in full by end of January 2026. Identify all establishment/roles that could be converted into apprenticeship either now or in the future. Fund additional apprenticeships roles. Employee Engagement Survey undertaken in Autumn 2025 with findings reported to SLT in December 2025 <p>Further Actions:</p> <ul style="list-style-type: none"> Restructure of HR and OD has established a Talent Acquisition Team, moving recruitment from transactional to strategic – team to be in place by March 2026 All directorates to have a workforce plan and associated actions and People Strategy Year 2 Delivery plan to be reviewed by SLT in Q3 of 2025/26 Develop and provide management reports and Directorate level down reports to identify clearer picture of recruitment and turnover data at a more detailed level - a recruitment pilot has taken place and feedback is being considered. Recruitment is not fully on Oracle fusion and therefore reports cannot be created until there is data in Oracle Fusion to pull from. Recruitment module is currently due to go live by March 26. 	<p>1st line Pulse surveys HR related KPIs and data Appraisal process</p> <p>2nd line Employee Engagement Survey Benchmarking analysis</p> <p>3rd line LGA Workforce Survey 2022 Internal Audit review 2025- Annual review process- Reasonable assurance</p>
10	<p>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</p>	9 (amber)		9 (amber)	8 (amber)	<p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> 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 Cabinet in November 2022. However, this has been determined to not represent value for money and as such will not be progressed. A working group has now been established to progress the specification and design of the new archives centre. A New Qualified Archivist is now appointed and in place. The Business Manager – Museums and Archives is also a qualified archivist. High level delivery programme now developed as part of working group 	<p>1st line Feasibility Study</p> <p>2nd line Cabinet approval of replacement archive solution</p> <p>3rd line</p>

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	<p>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.</p> <p>Risk area – All Council services</p> <p>Risk owner – Alan Lunt, Executive Director - Place Cabinet Member: Councillor Suzanne Hartwell</p> <p>Strategic themes impacted: All</p>					<ul style="list-style-type: none"> Revised feasibility that includes design, specification, and costs now underway with meetings undertaken during 2025 with both Dudley MBC (August) and Staffordshire CC (October) to review their archives and obtain relevant information to support Sandwell's design and implementation Capital funding allocated as part of the Council's capital programme in 2026/27 with a value of £3m <p>Further Actions</p> <ul style="list-style-type: none"> Funding sources for cost of remaining capital to build the archives needs to be identified and agreed which may include a bid to Arts Council England and/or National Lottery Heritage Fund. This will follow the design of the centre being agreed and to be submitted by end of 2026/27. A design feasibility was completed to support the temporary relocation of material currently located at Smethwick Library and restored archived material into Smethwick Council House prior to the construction of a new Archives Centre. Adaptation works currently underway with material to be relocated once returned from cleansing by March 2026 	<p>The National Archives</p> <p>Archive Service accreditation</p>
11	<p>Electoral arrangements</p> <p>The Elections Act 2022 introduced a range of changes over recent years including the ability for voters to apply for absent votes online and arrangements for postal votes. There remain a series of technical and operational issues that are being explored nationally, with there being a concern over the readiness of new systems which will continue over the coming years through further adjustments to processes and legislative requirements for elections. Should the Returning Officer be unable to implement any legislative, regulatory or procedural requirements associated with the conduct of elections, this could result in low voter confidence and some voters may be disenfranchised leading to a lack of confidence in election results.</p> <p>Risk area – All Council services</p> <p>Risk owner – Mike Jones, Service Director - Governance</p> <p>Cabinet Member: Councillor Kerrie Carmichael, Leader of the Council</p> <p>Strategic themes impacted: All</p>	8 (amber)		4 (green)	4 (green) Achieved	<p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> 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. A One Council approach is being taken in order that the wider Council can provide necessary support. The Electoral Commission continue to 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. LGBCE boundary review completed, final recommendations confirmed. Implementation through May 2026 all out local elections. Polling places review undertaken September-November 2025, final recommendations approved Full Council 09.12.25. Implemented for May 2026 elections. Robust and updated training programme is in place for all polling inspectors and presiding officers. Elections Steering Group comprising membership of Chief Executive as Returning Officer, Monitoring Officer / Head of Elections / Assistant Chief Executive as Deputy Returning Officers. Workstreams established for pre, during and post-election including communications, electoral process, prospective candidate and candidate information, post-election support for cohort of members. Job roles for election staff are being updated to provide clarification on what is required and to assist in arriving at the correct fee. Completed by November 2025. 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 current and any subsequent emergent Voter ID requirements to compliment national campaigns by the Electoral Commission. Regular briefings with members undertaken during recent local, regional and national elections. Regular networking meetings taking place relevant internal stakeholders including Executive Director, Service Director, Assistant Director and Manager as required. Capacity and resourcing options are being explored and subject to continuous review. No additional requirements identified. <p>Further Actions</p> <p>The Monitoring Officer and Elections Manager will continue to review national sector best practice guidance and emergent legislative information and provide regular updates to the Returning Officer and key stakeholders on the impacts of additional requirements. Borough-wide all-out elections will be undertaken in May 2026 following the completion of a review of local ward arrangements and boundaries by the Local Government Boundary Commission for England. A comprehensive delivery plan has been developed (September 2025) to ensure the robust and effective delivery of compliant elections for 2026.</p> <p>Commentary</p> <p>Risk profile retained at amber – whilst robust and comprehensive control measures implemented, the electoral process is a statutory requirement and any form of non-compliance carries significant risk in terms of compliance, operation and reputation.</p>	<p>1st line</p> <p>Elections Returning Officer</p> <p>Deputy Returning Officers</p> <p>Monitoring Officer</p> <p>Elections Service Manager</p> <p>2nd line</p> <p>Polling station inspectors</p> <p>3rd line</p> <p>Electoral Commission</p>
12	<p>Sandwell Local Plan</p> <p>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</p>	6 (green)		4 (green)	4 (green) Achieved Completion on and removal of risk June 2026.	<p>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.</p> <p>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.</p> <p>The Sandwell Local Plan was submitted to the Secretary of State for Examination in Public in line with programme on 11th December 2024. The Hearing concluded at the end of September 2025. The timetable as of December 2025 estimates the Examination in Public process (Main Modifications etc) to be completed in April 2026, with the publication of the Inspectors report in May 2026, and Adoption of the Plan in June 2026.</p>	<p>1st line</p> <p>Programme Manager</p> <p>2nd line</p> <p>Regular updates to Leadership Team, Cabinet Member for Regeneration and Cabinet as appropriate.</p> <p>3rd Line</p> <p>Ongoing review of conformity with emerging Government planning reforms.</p>

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	<p>loss of local democratic oversight.</p> <p>Risk area - Regeneration</p> <p>Risk Owner – Alan Lunt, Executive Director – Place</p> <p>Cabinet Member: Councillor Peter Hughes</p> <p>Strategic themes impacted: All</p>					<p>The Dedicated Programme Manager role will not be required beyond 31st December 2025 given the advanced stage of plan production. The remaining stages can be adequately resourced using existing resources in the planning policy team.</p> <p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> • Members regularly briefed on key and up to date issues. Informing of facts and evidence based. • Additional revenue budget secured to deliver the Sandwell Plan (Cabinet Report Dec 2022). • Activities monitored against agreed programme and reported to Leadership Team quarterly - consultation on draft Sandwell Local Plan completed in line with programme. <p>Further Actions</p> <ul style="list-style-type: none"> • Quarterly update reports to Leadership Team • Ongoing review to ensure the Plan conforms with emerging Government planning regulations where relevant. 									
13	<p>Organisational culture</p> <p>If the Council does not have an effective organisational culture, then this could result in:</p> <ul style="list-style-type: none"> • 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 • Potential for government intervention • Failure to deliver the corporate plan • Reputational damage • Missed opportunities for continuous improvement <p>Risk area – All Council services</p> <p>Risk owner – James McLaughlin, Assistant Chief Executive</p> <p>Cabinet Member: Councillor Kerrie Carmichael, Leader of the Council</p> <p>Strategic themes impacted: All</p>	6 (green)		4 (green)	4 (green)	<p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> • 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, 2024 and April 2025. • Launch of One Team Framework (values and behaviours) including Staff Conference and Managers workshops • Employee Engagement Survey 2025 results received by Strategic Leadership Team and to be discussed at Directorate Management Teams and team meetings - action plans developed by 2024 • Leadership with Purpose Conference held in September 2025 with top 170 managers in the organisation – theme was 'How to be Outcome Driven' • 'We Are Sandwell' Employee Awards held in October 2025 – well received by participants and high numbers of nominations received • Cabinet and Strategic Leadership Team Away Days arranged quarterly. • New Council Plan and People Strategy launched in July 2024 with accompanying Delivery Plan • New Neighbourhoods Model was implemented in April 2025 which will improve Members' access to officers on the ground to get things done. • Approval to recruit Service Director roles in ACE, Finance and Transformation, and Place directorates in May 2025 – five roles filled internally and five roles went out to advert - two roles filled with Chief People Officer and Service Director for Customer, Democracy and Neighbourhoods starting in January 2026. Plans being worked on to re-advertise vacant roles in January/February 2026 • 30 Managers to participate in WME's 'Accelerating Inclusion through Allyship' course to develop their inclusive leadership skills <p>Further Actions</p> <ul style="list-style-type: none"> • Delivery Plan for Year 2 of People Strategy - draft to be approved by SLT in December 2025. • Mechanisms to be identified for ongoing insight and assurance around health of Officer and Member Relationships • 2026 Leadership Conference to take place in September 2026 – theme to be identified • We Are Sandwell Awards in October 2026 • Targeted Management and Leadership Development programmes for women, minority communities and disability to be established – spring 2026 • Preparation for Corporate Peer Challenge in January 2026 • Proposals for revised senior leadership structures for Adult Social Care & Health and Children & Education were approved for consultation with staff by Members in December 2025. Implementation of the structures will commence after consultation concludes in January 2026 • Feedback expected on CQC inspection which provides an indication on organisational culture – report expected to be received by the Council in January 2026 • Six Months Performance Reviews – Moving from Basics to Outstanding – reviews to take place in December 2025 and January 2026 to focus on performance and accountability 	<p>1st line One Team Framework</p> <p>2nd line Employee Engagement Survey 2025</p> <p>3rd line External Reviews (Grant Thornton and LGA) providing assurance that organisational culture change has started to occur.</p> <p>Internal Audit review 2025- Annual review process- Reasonable assurance</p>								
15	<p>Medium Term Financial Strategy (MTFS)</p> <p>If the Council is unable to plan its income and expenditure effectively, and is unable to balance its budget, then this will impact on the Council's financial resilience and its ability to effectively discharge its statutory responsibilities. This will impact on the Council's ability to deliver sustainable services to the people of Sandwell.</p> <p>Risk Area – All Council Services</p>	*	*	*	*	<p>* 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 the risks, and that it will remain able to effectively discharge its statutory responsibilities, including the setting of a balanced budget for future years. Transformational savings may be required from 2027/28.</p> <table border="1" data-bbox="936 1740 2048 1852"> <thead> <tr> <th></th> <th>2025/26</th> <th>2026/27</th> <th>2027/28 Onwards</th> </tr> </thead> <tbody> <tr> <td>Delivery of the Medium-Term Financial Strategy (MTFS)</td> <td style="background-color: #669933;"></td> <td style="background-color: #FF9900;"></td> <td style="background-color: #FF0000;"></td> </tr> </tbody> </table> <p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> • The government will provide three-year funding settlements from 2026/27, which will significantly improve the Council's ability to plan its finances. • The most recent review by CIPFA that looked at financial resilience concluded that the Council is financially stable and in recent years has been able to contribute towards reserves through achieving a balanced budget or an underspend. An underspend was delivered in 2022/23, in 2023/24 and in 2024/25. The Council's level of earmarked reserves remains adequate to mitigate identified risks. • A fundamental review of the MTFS (in line with the CIPFA recommendations) was completed within 2023/24 to ensure that the Council understood the challenges ahead and to ensure that the MTFS matches the ambitions of the corporate plan for Sandwell. • A balanced budget for 2025/26 was approved by Council on 25th February 2025. 		2025/26	2026/27	2027/28 Onwards	Delivery of the Medium-Term Financial Strategy (MTFS)				<p>1st line Business case templates – Savings Proposals</p> <p>2nd line Budget and Corporate Scrutiny Board Star Chambers</p> <p>3rd line External Audit CIPFA financial management review LGA Corporate Peer Review Grant Thornton Value for Money Governance Review LG Futures benchmarking data</p>
	2025/26	2026/27	2027/28 Onwards												
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	<p>Risk owner – Alex Thompson, Executive Director of Finance and Transformation</p> <p>Cabinet Member: Councillor Paul Moore</p> <p>Strategic themes impacted: All</p>					<ul style="list-style-type: none"> The MTFP model has now been rolled forward and is being regularly updated within 2025/26 as new information on funding and expenditure emerges. A further iteration of the MTFS has been produced and published in October 2025, demonstrating that, subject to the Local Government Finance Settlement and subject to adoption and delivery of identified savings proposals, the Council will be able to balance its budget in 2026/27. The Council has taken steps to address the cumulative deficit incurred by Sandwell Children's Trust, committing to a three-year contract sum sufficient to offset the historic deficit built up as well as funding forecast in year costs. Putting this three-year contract sum in place has significantly increased the Children's Trust's financial resilience, reducing risk for the Council, and also providing certainty of expenditure for the Council and certainty of income for the Trust. In relation to delivery of savings, monthly 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. Every savings proposal is supported by a business case document setting out how the saving will be delivered. Star Chamber meetings continue to be used to support budget setting. During August and September 2025, a Star Chamber meeting was held in relation to each Council portfolio area, focusing on the area's financial position, savings delivery within 2025/26, ongoing budget pressures and savings to be delivered in 2026/27. Star Chamber meetings include the Chief Executive and Portfolio Holders as well as the appropriate Director and Finance Business Partners. This process will be repeated annually. Star Chamber meetings are used as the initiation process to generate further savings proposals for the following financial year and to test those proposals with elected members. This is the first step in the process towards balancing the budget for the following year. Directorate budget pressures and growth are calculated annually by Finance Business Partners, and for Adult Social Care the process includes a growth model that extrapolates client numbers and average placement costs forward, building in assumed increases in market rates. A Finance Strategy Manager post has been created, so that there is sufficient resource to create and update the MTFS model and to ensure assumptions, eg, pay inflation assumptions, are calculated with consideration and in accordance with wider local authority group assumptions. LG Futures have been commissioned to provide financial benchmarking data, including assumptions on grant income in future years, Regular discussions take place with regional S151 Officers over central government funding assumptions, and Sandwell's assumptions in this regard are aligned to the rest of the WMCA group of local authorities. An MTFS officer working group, including the S151 Officer and Finance Strategy Manager, meets weekly to ensure that the timetable for development and production of the MTFS is in place and on-track. The timetable includes all communications and engagement activities. The MTFS position is reported to, and discussed with, Leadership Team regularly, and Directors are fully engaged in the process of generating savings proposals to balance the budget gap each year. A budget timetable is now in place in relation to the 2026/27 budget, which includes regular sessions with Leadership Team and Wider Leadership Team, and consultation with key external partners. Several Cabinet workshops are held during the Autumn and Winter to engage Cabinet in the MTFS process and to ensure that elected members are willing to take each of the proposed savings forward for public consultation and then for implementation. <p>Further Actions</p> <ul style="list-style-type: none"> Use of benchmarking data to help identify opportunities for efficiencies, savings and service improvements - Ongoing The Council will need to monitor progress closely against SCT's proposed savings plan to ensure that savings are on track and are delivered as planned. The Council will need to encourage delivery of plans and Children and Education colleagues will need to report on progress, highlighting non-achievement and any impact on future years' costs as early as possible – During 2026/27 A programme of projects that will result in savings will need to be developed by the Transformation Programme team – Early/mid 2026 The Council will need to put in place a DSG mitigation plan to ensure that the forecast overspend for the High Needs Block can be mitigated in the medium-term, so that there is no impact on the General Fund, which could de-stabilise the MTFS – Early/mid 2026 																																																		
16	<p>Budget Monitoring and Management</p> <p>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.</p> <p>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).</p> <p>Risk Area – All Council Services</p> <p>Risk owner- Alex Thompson, Executive Director of Finance and Transformation</p> <p>Cabinet Member: Councillor Paul Moore</p> <p>Strategic themes impacted: All</p>	*	*	*	*	<p>* 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 an appropriate degree of tolerance. The risk profile for the 2025/26 financial year, in relation to a potential overspend of the Council's budget, is as follows:</p> <table border="1"> <thead> <tr> <th rowspan="2">Monitoring Period</th> <th colspan="12">2025/26</th> </tr> <tr> <th>Apr</th> <th>May</th> <th>Jun</th> <th>Jul</th> <th>Aug</th> <th>Sep</th> <th>Oct</th> <th>Nov</th> <th>Dec</th> <th>Jan</th> <th>Feb</th> <th>Mar</th> </tr> </thead> <tbody> <tr> <td>Revenue Budget Monitoring Position – General Fund</td> <td></td> </tr> <tr> <td>Revenue Budget Monitoring Position - HRA</td> <td></td> </tr> </tbody> </table> <p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> 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. Senior managers 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 outturn 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. 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. Strategic Finance Business Partners 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 senior managers and that mitigating actions are proposed to deal with overspends as necessary. 	Monitoring Period	2025/26												Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Revenue Budget Monitoring Position – General Fund												Revenue Budget Monitoring Position - HRA												<p>1st line Assigned budget holders</p> <p>2nd line Leadership Team Budget and Corporate Scrutiny Board</p> <p>3rd line External Audit Annual Internal Audit review- budgetary control</p>
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Risk Ref	Risk Title and Description	Previous score (August 2025)	Movement in risk score	Current risk score (December 2025)	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)
						<ul style="list-style-type: none"> 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. 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. These measures help to mitigate any deterioration in the monitoring position and also ensure that the required in-year vacancy management savings (as per the MTFS) are delivered. <p>Further Actions</p> <ul style="list-style-type: none"> Involving budget managers in the budget setting process will ensure that they understand their budget figures and how they have been developed - Ongoing Introduction of budget monitoring within Oracle Fusion in the future, which will provide each budget manager with 'real time' access to their area's budget and spend data – During 2026/27 Introduction of budget monitoring within 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 senior managers and that mitigating actions are proposed and put in place to address overspends – During 2026/27 	
17	Housing Improvement. 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 (including compliance with Awaab's Law) from both the Regulator of Social Housing and the Building Safety Regulator, with rigour and pace, then the Council will fail in its responsibilities to provide good quality affordable housing. Risk Area – Housing Risk Owner – Alan Lunt, Executive Director - Place Cabinet Member: Councillor Vicki Smith Strategic themes impacted: 1, 2, 3 and 5	9 (am)		9 (amber)	6 (green) March 2026	<p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> Self-assessment completed against consumer standards with improvement actions embedded in the wider Housing Improvement and Transformation Plan Governance Structure and reporting in place to monitor progress with the improvement plan, with regular reports to Leadership Team, Leader Meeting, Cabinet Member, Safer Neighbourhoods and Active Communities Scrutiny Board and Tenant and Leaseholder Scrutiny. Third party audit to ensure compliance with documentation. Housing Transformation Project in flight to delivery service efficiency, compliance and improvement, 10 overarching projects, with strong focus on returning to compliance with breaches of the consumer standards. Monthly co-regulatory progress meetings with the Regulator for Social Housing Risk reflects the C3 regulatory judgement issued by the Regulator for Social Housing in October 2024 and progress made on delivery of the Housing Improvement and Transformation Plan Good progress made on the delivery of the Housing Transformation Programme, acknowledged by the RSH but still a significant amount of work to be delivered, including the procurement and implementation of a new integrated housing management software system/s which will be a major project. Further progress needs to be made before we can be assured and confident of achieving a C1 regulatory grade at inspection. 	<p>2nd line External consultant acting as our critical friend to provide external validation on compliance with the consumer standards.</p> <p>3rd line Internal audit reviews 2025: <ul style="list-style-type: none"> Housing Transformation- Electrical Safety Inspections – Limited assurance Riverside – Gas safety compliance – Reasonable assurance Housing Transformation – Flat entrance doors in High Rise buildings- Reasonable assurance Housing Transformation – Stock condition data- Reasonable assurance Co-regulatory progress meetings with the Regulator for Social Housing </p>
18	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 Strategic themes impacted: 1, 2, 3 and 5	9 (amber)		6 (green)	6 (green)	<p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> 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. A second former Extra Care Scheme converted from single person TA to family TA. Mitigations put in place and availability of additional homeless prevention grant has assisted to reduce risk Proposed changes to Homeless Prevention Grant not implemented resulting in a more favourable allocation than forecast for 2025/26, with additional top up Grant received in year. Additional procurement in progress for interim accommodation to reflect longer TA placements. Private Rented Sector – rent top ups to prevent homeless presentations where there is an affordability gap and risk of homelessness New emerging risk from the implementation of the Renters Reform Act – mitigated by allocation of new burdens funding Increase in allocation of Homeless Prevention Grant for 2026/27 but with more stringent spending criteria but supports our prevention model which has delivered one of the lowest number of households in temporary accommodation per 1,000 in England. <p>Risk downgraded to Green because of positive financial forecast and additional grant income, but with a caveat that this could change with an influx of new demand.</p>	Ministry of Housing, Communities and Local Government Advisory meetings held quarterly (3rd level).

19	<p>Continuous Improvement The Council has a Best Value Duty for Continuous Improvement and must evidence compliance. This can be achieved through a combination of regular tests such as adherence with local, and national, responsibilities and objectives and ongoing assessment.</p> <p>Without ongoing assessment and evidence of improvement the Council could fail its best value duty, risk reputational damage and incur material costs in resolving such a situation.</p> <p>Risk Area – All Council Services</p> <p>Risk Owner – James McLaughlin, Assistant Chief Executive</p> <p>Cabinet Member: Councillor Kerrie Carmichael, Leader of the Council</p> <p>Strategic themes impacted: All</p>	6 (green)		6 (green)	4 (green) March 2026	<p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> Key documents to measure improvement include: <ul style="list-style-type: none"> Council Plan (2025 to 2027) MTFS (2025 to 2029) Customer Experience Strategy (2025) Customer Standards for Staff (2025) Directorate Business Plans (2025/26) Quarterly Performance Monitoring to Performance Board; SLT; Cabinet and Scrutiny. Performance Monitoring includes the achievement of Council Plan; National Indicators; local Indicators; directorate objectives; trend analysis; improvements to under-performance; collection of customer Satisfaction data Key Process and activity monitoring <ul style="list-style-type: none"> Updated Constitution Procurement Board Transformation Programme Board Oracle Steering Committee Annual Internal Audit Report Voluntary Sector Grants Board <p>Further Actions to enhance controls</p> <ul style="list-style-type: none"> Customer satisfaction <ul style="list-style-type: none"> Review of the One Stop Shop and exploration of a Community Hubs offer for face to face services in each Town (Mar 2026) Technology – review of all Customer related technology & identification of any gaps: procure delivery partner to replace the Council's telephony system (Mar 2026) Further delivery of bespoke Customer Services Training for front facing roles across the Council (Autumn / Winter 2025/26) Leadership and Management Conference set out clarity on quality and consistency of customer services (April 2026) Appointment of Service Director – Customer, Neighbourhoods and Democracy (Jan 2026) Establishment of Customer Ambassadors across the workforce (Mar 2026) A new telephony system implemented (Feb 2026) Launch of revised Member Portal for Councillor Casework Enquiries (Jan 2026) Launch of WhatsApp functionality in Phase 2 of the Telephony System implementation (Jun 2026) Procurement <ul style="list-style-type: none"> Pipeline aligns to contract register and forward plan (Mar 2026) Contract Management via Oracle Fusion (June 2026) Revised Procedure Rules (Mar 2026) Bi-Annual cycle of review of Major contracts via Board (Feb 2026) Align activities of Corporate Grants Board with Procurement Board (Apr 2026) Performance <ul style="list-style-type: none"> Report progress against Internal and External audit recommendations (Feb 2026) Revise presentation of Directorate Plans to align to high level performance measures (Mar 2026) Report achievement of 'Brilliant at the Basics' HR data to Performance Board (Mar 2026) Receive and Respond to CQC Assessment (Jan 2026) Receive and respond to CPC Report (Jun 2026) 	<p>1st line Internal Reporting via Governance Structures and Boards</p> <p>External Reporting via Member meetings</p> <p>2nd Line External Assessment via Surveys, Feedback, Audit and/or Government Agencies</p> <p>3rd line Local Government Ombudsman.</p> <p>Secretary of State.</p> <p>Judicial process.</p> <p>External Assessment (2025)</p> <ul style="list-style-type: none"> CQC OFSTED (Good) External Audit (Qualified) Housing Regulator (Level 3) Peer Challenge (2026) Central Government Intervention in SCT (Good)
20	<p>SEND If the Council does not consider options on how to manage:</p> <p>A) the increasing upwards trajectory of demand in respect of SEND Travel Assistance</p> <p>B) both demand and cost of SEND placements</p> <p>there will be a significant impact on the Council's budget and the High Needs Block</p> <p>Risk Area – Children's Services</p> <p>Risk Owner – Sally Giles, Director of Children and Education</p> <p>Cabinet Member: Councillor Jalal Uddin</p> <p>Strategic themes impacted: 1</p>	9 (amber)		6 (green)	6 (green) Achieved 9 (amber) Apr 2026	<p>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.</p> <p>Further actions:</p> <p>A) SEND Travel Assistance</p> <p>Current and Ongoing Controls</p> <p>The introduction of a Flexible Purchasing System (FPS) has helped to reduce the cost of home to school transport without impacting on the quality of service or safeguarding of children and young people with SEND and their families.</p> <ul style="list-style-type: none"> More competitive market with 29 operators now on the FPS Single school contracts continue to offer better VFM Benchmarking of contracts to ensure continued VFM with higher cost contracts being retendered Focus on maintaining the average cost per head below £12,900 per annum which means that the Council can deliver within budget if demand remained constant Improved data supporting better demand and financial forecasting Robust contract management ensuring no decline in service provision Focus on reducing demand for transport and increasing children accessing travel training and families taking up the offer of parent mileage of a personal transport budget has commenced and is contributing to reduced costs Improved confidence in expected and future demand will support better and more accurate budget planning, with future budget based on projected demand. Embedding of the locality model from academic year 26-27 onwards, will enable children to attend their local schools reducing the demand for travel assistance Continue to develop the FPS to provide greater control for the Council and reduce the risk of increasing costs for new all contracts. <p>Further Actions</p> <ul style="list-style-type: none"> Development of quality framework to provide assurance that reducing costs are not impacting adversely on service delivery Apr 2026 Working with transformation partner to review and update Travel Assistance Application Process to enable easy access for families, timely decision making and encourage uptake of travel training, parent mileage and personal budgets. Apr 2026 Post 16 offer to be reviewed alongside the Council's fees and charges programme, with any planned changes being implemented from Sept 2026. 	<p>1st line Key Performance Indicators</p> <p>Budget Monitoring</p> <p>2nd line Regular updates to leadership team</p> <p>Corporate Transformation Board</p> <p>3rd line Ofsted monitoring visits</p> <p>Areas SEND Inspection July 2023</p> <p>Internal Audit Report- SEND placement costs 2025- Limited assurance</p>

				<p>Given the above, this element of the risk has been reduced as the cost of SEND travel has reduced to within budget, providing demand remains constant or within projections.</p> <p>B) Demand & Cost of SEND Placements</p> <p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> Historic EHC assessment backlog has been fully removed Data quality has significantly improved. Accurate live dashboards in place to track performance, predict demand and inform decision making. Locality dashboards are being developed to provide the same insight at town and cluster level. Early years pathways are working well, with earlier identification evidenced and the youngest child with an EHC plan aged 1 year and 8 months. Multiagency quality assurance audits are in place, strengthening joint working and testing the quality of plans and reviews. Decision making panels being trialled and implemented A strong area partnership is established Lived experiences framework implemented and actively gathering voices to inform strategic development. Smethwick locality feasibility work is complete, with all schools agreeing to participate in a pilot locality model. The EHC team management structure is now fully permanent, providing stable leadership and oversight. A transformation partner has been secured and will commence in December <p>Further Actions</p> <ul style="list-style-type: none"> Improvement Partner to be appointed via procurement process (December 25) In conjunction with SMBC and partners Improvement Partner to review and refresh transformation programme and align it with savings targets (jan 26 onwards) Review of EHC team and admin to look at all statutory functions and processes (January 26) Decide on next steps of a locality-based January 2026 Special School Panel for decision on funding and placements (January 2026) Clear Thresholds for other decision making implemented and training for schools (Feb 2026) Increase Resource base provision and long stay places to increase local targeted placements (April 2026) Final publish of SEND strategy, sufficiency plan an SEF (March 2026) Begin pupil tracking to consider and review family pathway and impact of multiagency outcomes (Feb 2026) Implementation of Early Years assessment places to ensure all children start school with correctly identified needs (Feb 2026) <p>The time taken in securing the transformation partner has delayed many outcomes resulting in the target score achievement date to move to April 2026 (from January 2026)</p>		
21	<p>Building Community Cohesion</p> <p>If there is a breakdown in community cohesion this may lead to increased social tensions, a breakdown of trust within communities. This could also lead to a lack of cooperation and understanding amongst community members impacting on the overall wellbeing of residents, the safety of the Borough and the ability to address any extremism effectively.</p> <p>Risk Area – Place</p> <p>Risk Owner – Alan Lunt, Executive Director - Place</p> <p>Cabinet Member: Councillor Suzanne Hartwell</p> <p>Objectives impacted: All</p>	9 (amber)		9 (amber)	<p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> The Sandwell Plan prioritises improving outcomes, tackling inequalities, and promoting business growth by working with business, residents, partners, and education providers to benefit Sandwell communities and residents. Collaborating with residents and communities to listen views and ideas and working to make a positive difference to their lives. Working with partnership through the Sandwell Community Safety Partnership to tackle violence, including domestic abuse, hate crime and violence against women and girls. Supporting the most vulnerable – including people who are homeless, and rough sleeping and vulnerable adults and children at risk of exploitation. Supporting new arrivals of asylum seekers, refugees and other migrants to settle well in Sandwell, in line with our accreditation as a Borough of Sanctuary. The promotion and encouragement of community events to bring people together in a positive environment. Fulfilling the Council's Prevent statutory duty to prevent people from being drawn into terrorism. Engagement with faith organisations across the borough. <p>The ongoing controls should assist in the mitigation of this risk to the target score.</p>	<p>1st line</p> <p>Key Performance Indicators for services and the delivery of the Sandwell Plan</p> <p>Operational Partnership subgroups under the Sandwell Community Safety Partnership</p> <p>Prevent Delivery Group</p> <p>Crime data</p> <p>Community tension monitoring</p> <p>2nd line</p> <p>Sandwell Community Safety Partnership Board</p> <p>Reports to Scrutiny</p> <p>West Midlands Community Safety Partnership and regional groups</p> <p>CONTEST Board</p> <p>3rd line</p> <p>Home Office Prevent Duty assessments</p> <p>Counter Terrorism Local Profile</p> <p>Annual residents Survey</p>
22	<p>Pandemic Preparedness</p> <p>The likelihood and impact of a pandemic is based on national modelling. The potential for a new pandemic remains unchanged although the timing and severity is unpredictable. The threat and potential impact of pandemic influenza (flu) is such that it remains a top risk on the UK Cabinet Office National Risk Register.</p> <p>During a pandemic the Council will be expected to maintain key services in addition to the provision of certain pandemic specific tasks. Due to the nature and</p>	8 (amber)		8 (amber)	<p>8 (amber) (ongoing – this risk is beyond our control and deter- mined by national team)</p> <p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> Pandemic Plan review – national guidance on pandemic planning guidance due winter 2024 has been delayed, therefore a review of the existing plan will be updated when new guidance is released. To mitigate the delay in guidance a framework is being developed to outline the approach the LA will take during a pandemic to ensure we are able to respond and recover from an outbreak of influenza or other novel respiratory pathogen (including learnings from covid pandemic). Business continuity plans – Resilience team prompt services to review their business continuity plans quarterly to mitigate reduction in staff numbers, and other ways a pandemic may impact on service delivery including supplies, IPC measures, disruption to the system. This is crucial for essential services, Excess deaths plan – Sandwell's excess deaths plan was reviewed and updated in 2024. Health Protection Board – multiagency intelligence & surveillance to identify any changes in trends or new emerging threats from infectious diseases. Black Country Health Protection Group (Integrated Care Board lead, NHS, UK Health Security Agency and LA) Exercise Tangra and Solaris completed – West Midlands LRF led planning exercises to test the NHS (Tangra) and system (Solaris) in response to an infectious disease. Duty Director rota means any new threat will be picked up from partners, such as UKHSA, in a timely manner. National Pandemic Exercise Pegasus was held in Autumn 2025 to include pandemic plans, business continuity impacts and test Council response, alongside partner agencies. West Midlands is a focus area for the exercise suggesting there may be a higher impact and response required. Three phases were completed over a period of nine weeks focussing on emergence and containment. Feedback of response to the national team through the West Midlands Local Resilience Forum (WMLRF) and debriefs have also taken place internally, through WMLRF and ADPHs 	<p>1st line</p> <p>Pandemic Influenza Plan</p> <p>Pandemic Response Framework (in progress)</p> <p>Excess Deaths Plan</p> <p>Business Continuity Plans</p> <p>Exercise Pegasus</p> <p>2nd line</p> <p>Health Protection Board</p> <p>3rd Line</p> <p>Public Health Senior Leadership</p>

	<p>impact of a pandemic the provision of such services will need to continue, and services may need to review how this can be provided utilising their business continuity plans. It is expected that strong national guidance including potential emergency legislation would shape local response.</p> <p>Pandemics can have not only a health impact on the Council and residents but the economy too.</p> <p>Keeping residents trust and confidence could impact on the Council's reputation.</p> <p>Risk Area – All Council services</p> <p>Risk owner – Frances Howie, Interim Director of Public Health</p> <p>Cabinet Member: Councillor Jackie Taylor</p> <p>Strategic themes impacted: All</p>				<p>Further Actions</p> <ul style="list-style-type: none"> Lessons learnt from Exercise Pegasus will be collated and feedback anticipated early-mid 2026. New national guidance likely to follow. This exercise will likely prompt services to use their business continuity plans, but departments may need to consider some commissioned services and assurance around their business continuity plans in the incidence of a pandemic. Communications role in Exercise Pegasus will be crucial to protect the Council's reputation and maintain trust with residents. Internal review to identify gaps and lessons learnt from Exercise Pegasus are ongoing and awaiting national and regional feedback to inform of gaps not identified without our local response. Anticipated early-mid 2026. Review of the Council pandemic flu plan following national guidance released in 2026. Exercise Pegasus – phase 4 to be carried out late 2026 with a focus on recovery <p>Local Authorities are designed as Category 1 Responders under the Civil Contingencies Act 2004. Director of Public Health (DPH) is a statutory chief officer of the local authority and part of the public health mandate.</p>	
23	<p>Changes in the Integrated Care Board (ICB) and the impact on Adult Social Care and the Council</p> <p>Risk to resource allocation with regards to Better Care Fund (BCF) and wider budget pressures across the health economy may impact on integration and support to residents in Sandwell.</p> <p>Risk Area – Adult Social Care</p> <p>Risk Owner – Rashpal Bishop, Director of Adult Social Care</p> <p>Cabinet Member: Councillor Jackie Taylor</p> <p>Strategic themes impacted: 3 and 5</p>	New Risk	n/a	12 (red)	<p>9 (amber) March 2026</p> <p>Current and Ongoing Controls</p> <ul style="list-style-type: none"> Engagement with the Health and Social Care Partnership Board. Regular monitoring of Better Care Fund allocations and financial planning through Sandwell Joint Partnership Board (JPB) governance meetings. Ongoing engagement between SMBC Adult Social Care finance teams and Integrated Care Board (ICB) finance leads to understand emerging budget scenarios. Strategic oversight via the Sandwell Health and Care Partnership (SHCP) and Health & Wellbeing Board, ensuring alignment of priorities. Routine review of commissioning intentions and demand modelling to identify early impacts on ASC services. To mitigate the risk we are actively engaging at multiple levels both Nationally/regionally and locally to inform discussion as these are national decisions. 	<p>1st Line ASC senior management oversight of BCF delivery, financial forecasts and risk mitigation.</p> <p>Directorate-level monitoring of integration activity and potential service impact.</p> <p>2nd Line Oversight Functions ASC Finance and Commissioning provide challenge and assurance on BCF planning and resource allocation.</p> <p>Corporate Risk Management monitoring changes to ICB structures and impact on inter-agency collaboration.</p> <p>Governance structures such as JPB, and SHCP providing ongoing scrutiny.</p> <p>3rd line Internal Audit review of Better Care Fund governance, decision-making processes and financial controls.</p> <p>External audit assurance on financial stewardship and partnership governance.</p> <p>NHSE oversight of ICB governance changes and system performance.</p>