

Appendix 1 Corporate Risk Register Red Risks

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
PST0001 Cheesbrough, Heather	The Whitgift Centre is not redeveloped as anticipated. Previous uncertainty in respect of retail behaviours has been exacerbated by Covid 19, which has further affected the likelihood of the risk materialising. The redevelopment was removed from the Unibail development pipeline in Feb 20 and there is no date for the redevelopment. The Croydon Limited Partnership (CLP) partners are both suffering from loss of income and are seeking to raise funding to strengthen their balance sheets. Both partners need to review business model and agree new approach to the Whitgift during a time of uncertainty and restricted finances major personnel changes in both partners give rise to a loss of organisational memory. RISK & CONTROLS MEASURES REVIEWED BY: Heather Cheesbrough DATE: 10/2/22 Reviewed at CMT 18/01/2022 (Risk generated 18/05/2015).	<ul style="list-style-type: none"> Major economic and social impact if development does not go ahead. Political and media scrutiny. Reputational Damage 	Cheesbrough, Heather	5	5	25	4	4	16

Existing Controls

- Clause 11 meetings -Clause 11 meetings to be held for a maximum period of 12 months as set out in the ILTA, this is a formal stage to work through options on non-delivery of the scheme. The meetings complete Feb 2022.
- Communication channels between politicians and officers with CLP kept cordial and relationship maintained to optimise influence. -
- LBC to continue to press CLP for a robust Meanwhile and Management Strategy to maintain footfall -with monthly meetings to exchange enquiries/contacts and proposals
- Officers and their consultant team seek to hold CLP to account on their plans and to manage the CPO process. -
- Projects will need to be reprofiled within the Growth Zone to later years. -
- Regular communication with the Whitgift Foundation -The Foundation is the freeholder of the majority of the site.
- Regular meetings with CLP to maintain dialogue between partners. -Robust discussion through planning pre-application process. ...
- Robust record keeping and retention of professional advisor team who have been involved since the beginning of the project -
- The Council through its statutory powers - Local Planning Authority (LPA), CPO and land assembly, and as a Highway Authority. -
- The ending of the exemption for CLP to pay Business Rates on unoccupied buildings due to the CPO -
- The Indemnity Land Transfer Agreement (ILTA) sets out the responsibilities of the parties, penalties with. -timeframes, which will need to be complied with and will need to be actively managed.
- The setting up of a Advisory Town Centre Board -Board of Stakeholders to include CLP, chaired by the Council to meet every 6 weeks to seek to collaborate and hold to account all stakeholders to the regeneration of the town centre

Future Controls

Target Date

- End the arrangements entirely with agreement, but would have to address all outstanding issues, land transfer, compensation and make provision for various outstanding claims. (Completion financial year 2021/22). This would have a significant financial impact that would need to be negotiated with CLP.
- The Council seeks to introduce a new development partner, once the ILTA expires (February 2026).
- The preparation of a new Indemnity Land Transfer Agreement (ILTA) that reflects the changed circumstances. (Completion financial year 2025/26). This would require the agreement of both parties

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
RCS0032 Ennis, Richard	<p>Croydon Council companies: Robust governance, financial accounting treatment & risk management procedures/frameworks are not activated to safeguard the interests of the Council and it's taxpayers in respect of all subsidiary organisations where the Council has an interest as raised in External Audit's Management letter/report presented to GPAC 20th October 2021. (Specifically in reference to Croydon Affordable Homes & Croydon Affordable Tenures and Brick x Brick).</p> <p>Reviewed at CMT 18/01/2022</p> <p>Grant Thornton - 'Report in the Public Interest' recommendation number(s): 8,12,17,19 & 20.</p> <p>(Risk generated (26/02/2021))</p>	<ul style="list-style-type: none"> • Significant financial accounting adjustment • Reputational damage. • Political interest and scrutiny. • Media interest and scrutiny. • Council placed in unstable financial position leading to potential bankruptcy. • Significant fraudulent activity. • Continuing and increasing levels of non-compliance. 	Ennis, Richard	5	5	25	5	5	25

Existing Controls

- Annual business plan of BXB reported to Cabinet. -
- Cabinet decision for managed wind down of BxB reached with build out of some sites -
- Cabinet member responsibility in portfolio. -
- Council taking legal advice in respect of Croydon Affordable Homes and Croydon Affordable Tenures -
- Dedicated shareholder function in place to manage relationship and risks. -
- LBC non-executive directors allocated to serve on all subsidiary Boards. -
- PwC Review of the transparency of reporting of any remedial action taken to address in year overspends. -
- Shareholder boards established specifically for Brick by Brick -and secondly for all other external companies feeding into the working group for council companies to report as part of the renewal plan delivery
- Shareholder Representatives and responsibilities identified following review. -
- Strategic review recommendations agreed to reduce risks and deliver secure financial path forward. -

Future Controls

- Report on governance of external and related companies approved with target date for further work/implementation of the CCSMP structure with Member/Cabinet involvement, meetings scheduled to end of 2022

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
RCS0034 Ennis, Richard	Poor financial control and ineffective application of governance arrangements continues to lead to an unstable financial situation, including contract spend and pressures in our major partnership areas including the NHS. Reviewed at CMT 18/01/2022 Grant Thornton - 'Report in the Public Interest' recommendation number(s):1-20. (Risk generated 22/10/2020).	<ul style="list-style-type: none"> Internal Controls rated at 'limited' or 'no assurance' by Head of Internal Audit. Continuing instances of non-compliance with corporate policies and legislative requirements. Political scrutiny and interest at local and national level. Media interest at local and national level. Increasing and uncontrollable financial loss. Legislative action. Staff redundancies. Report in the Public Interests (RIPI) issued by External Auditors. Non delivery of in year savings 	Ennis, Richard	5	5	25	5	3	15

Existing Controls

- CMT co-ordination to identify and instigate savings strategies. -
- Collaborative working with MHCLG Improvement & Assurance Panel. -
- Finance Consultant issued report into improving finance system. -
- Immediate spending controls implemented across the Council. -Recruitment; PCards; Spend control panel.
- Introduced non-essential spend and recruitment controls as if s.114 notice issued. -
- Leader, Cabinet Member for Finance & Resources and the Chair of General Purposes & Audit Committee -attended LGA Training 07/11/2020.
- Monthly reporting to CMT/ Cabinet. -
- Proper management of purchase orders to ensure compliance with corporate policy to eliminate retrospective activity. -
- Rapid review completed to highlight issues. -
- Savings assurance meetings with S151 Officer and CEO implemented -
- Spending Control Panel in place monitoring and approving all expenditure across the Council. -

Future Controls

- Outcome of forensic audit to be considered. 2 Directors of Finance from other boroughs also peer reviewing Dec 2021
- Review of 'My Finance' and 'My Resources' systems: Jan 2022
- Review of scheme of delegation and constitution in conjunction with Monitoring Officer Dec 2021.
- Training programmes to be introduced to improve General Purposes & Audit Committee (GPAC) and Scrutiny Committees. Planned training programme ongoing / continuous through financial year 2021/22.

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
RCS0037 Ennis, Richard	Further deterioration in Internal Control & Governance as a result of capacity, budget and resourcing constraints in the organisation. Reviewed at CMT 18/01/2022 (Risk generated 26/02/2020).	<ul style="list-style-type: none"> Financial / Reputational and Legal implications arising from bad decision making. Poor data control leading to lack of financial control Inadequate financial governance failure to comply with probity requirements, legislation, local regulations or council policy. S114 Notice. Report in the Public interest. 	Ennis, Richard	5	5	25	5	3	15

Existing Controls

- Commissioning & Procurement Framework being reviewed with LGA Support -
- Committee Award process for contracts. -
- Higher profile of key policies and procedures and easier access to support and guidance. -
- Internal review of the current internal governance structures being conducted by Executive Leadership Team. -(Completion October 2021).
- Robust Internal Audit Programme in place. -
- Spend Control Panel -Medium Term Financial Strategy Work of Steering Board (Exec Directors and Directors).
Financial Procedures Reviewed
Monthly Budget Monitoring
PMO monitoring of adherence and delivery of Renewal Plan
- Strategy implemented to raise profile of Governance / Internal Audit function to ensure appropriate adherence -at all levels across organisation.

Future Controls

- Finance systems including 'My Resources' and 'My Finance' to be reviewed Jan 2022.
- Review by Section 151 officer of the skills and capability and structure of Finance function Peer review with other councils and LGA.
- Review of training offer by L&OD to ensure provision of 'fit for purpose' support to all employees. December 2021.

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
RCS0039 Ennis, Richard	<p>The audit of the 2019/20 and 2020/21 accounts could require two significant adjustments, as highlighted in External Audit's management letter/report to GPAC 20 October 2021, to provide a balance and not be qualified. In relation to the 19/20 and 20/21 accounts further significant work is required in relation to the accounting treatment of Croydon Affordable Homes and Croydon Affordable Tenures with any financial implications for both the General Fund and Housing Revenue Account to be dealt with after this review. In addition, the council's bank reconciliations fail to balance for 20/21.</p> <p>Reviewed at CMT 18/01/2022 (Risk generated 22/02/2021).</p>	<ul style="list-style-type: none"> • Qualified accounts provided in respect of 2019/20. • Loss of control of financial position • Political scrutiny applied at local and national level. • Media interest and scrutiny at local and national level. • Continuing financial loss. • Reputational damage. • Potential investigation of historic financial practices. • Impact on reserves 	Ennis, Richard	5	5	25	5	3	15

Existing Controls

- Regular meetings with Grant Thornton and corporate finance team to monitor progress of audit -
- Specific use of transformation funding in relation to 19/20 and 20/21 audited by Grant Thornton -in consultation with corporate finance team.
- The council has engaged CIPFA to advise in relation to the bank reconciliation processes and systems. -
- The Council is taking advice from PWC on accounting treatment -and Trowers and Hamlins on company legal arrangements in relation to Croydon Affordable Homes and Affordable Tenures and QCs input (James Goudie)

Future Controls

- Additional resources in corporate finance to support increased support and oversight of the accounts. This work to be driven by the Section 151 officer review of the Finance function and the effective use of 'My Resources' and 'My Finance' and peer review. Review to complete...?

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
RCS0040 Ennis, Richard	In respect of the 2022/23 financial year the additional savings as set out by MHCLG in the Capitalisation Direction Agreement (2021) are not delivered, including £12M identified savings associated with NHS contract negotiations together with the risk of not meeting the challenges of the spending review/local government grant settlement and council tax and social care precept restrictions, leaving the 22/23 budget unbalanced. **The Council would therefore not be able to 'balance the budget' also leading to the refusal for the further £25m loan as part of the final Capitalisation Direction Agreement.** Reviewed at CMT 18/01/2022 (Risk generated 22/02/2021).	<ul style="list-style-type: none"> Do not meet terms and conditions set out by MHCLG in Capitalisation Direction Agreement (2021) / Three Year Delivery Programme. Inappropriate financial behaviour and practice evidenced. Political scrutiny applied at local and national level. Media interest and scrutiny at local and national level. Impact on reserves Continuing financial loss and potential S114 notice Reputational damage. Potential investigation of historic financial practices. Not balancing 22/23 budget. 	Ennis, Richard	5	5	25	5	3	15

Existing Controls

- Corporate finance working with services to identify further savings for 2022/23 -via Star Chamber process
- MHCLG Improvement & Assurance Panel. -
- Public consultation activity. -
- Review and revision of budget setting process and meetings being conducted by Section 151 officer. -
- Steering board made up of CMT and Directors to oversee the strategy to achieve the additional savings targets established. -

Future Controls

- Renewal plan to be reviewed January 2022.

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
ASC0028 Robson, Simon	<p>National Hospital Discharge funding for 4 weeks is confirmed to 31/3/22. The current position is this funding will stop from 1/4/22. The risk is that staffing will then have to be reduced and impact on patient care and hospital length of stay and flow will be severely impacted. Likelihood increased - Funding is due to end but current local and national negotiations have not reached a settlement and is high risk that the current model is not sustainable and a new sustainable model will need to be put in place.</p> <p>RISK & CONTROLS MEASURES REVIEWED BY: SIMON ROBSON DATE: 9/2/22</p> <p>(risk generated 01/03/2021). Reviewed at CMT 18/01/2022 Reviewed 19/01/2022 SR/SH</p>	<ul style="list-style-type: none"> Unable to meet deadlines as per the Care Act Financial impact due to packages of care required above BAU budgets. That delays are experienced in the hospital 	Robson, Simon	5	4	20	5	3	15

Existing Controls

- Funding £5.4m for 22/23 secured from CCG; to monitor spend against activity -Target date 1/6/22
- Options analysis of impact of returning to BAU and the impact this will have on the NHS and residents. -Funding extended until 31 March 2022 to review in January
- Partnership working and financial modelling activated. -

Future Controls

- Re-introduction of continuing healthcare teams. Review Feb 2022
- Review re-ablement and LIFE systems. Review Jan 2022
- Work with LGA on analysis of the long-term impact of Covid on adult social care. Review Jan 2022

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
ASC0033 Robson, Simon	<p>Potential breach of local authority statutory responsibility in delivering the approved mental health professional service due to lack of capacity and resources. Proposed plan to move resources from other areas of Adult Mental Health Social Care will result in increased risk in delivering statutory local authority interventions and commitment. If plan were to be implemented there would be an increased number of unallocated caseloads within Community Mental Health service.</p> <p>RISK & CONTROLS MEASURES REVIEWED BY: SIMON ROBSON DATE: 9/2/22</p> <p>Reviewed at CMT 18/01/2022 Reviewed 31/01/22 VN Reviewed 15/02/22 SR</p>	There would be cancelled assessments, delays in carrying out assessments, unallocated caseloads of various complexities, staff sickness, resignations and an increase in potential serious incidents occurring.	Robson, Simon	4	5	20	3	4	12

Existing Controls

- Collaborative working with MH teams to manage risk. -Ongoing discussions and collaboration with system partners re ownership of risk where MHA assessments have to be cancelled or rescheduled due to lack of capacity. This may require crisis and contingency planning from responsible community MH teams and the AMHP service.
- Head of Service in partnership with SLAM Director of Operations -undertaking options appraisal for short term remodelling of service to agree more resilient service delivery and adequate capacity. Target date 1/3/22
- Leadership and management support. -Advanced AMHP practitioners and team managers to support shift coordination within the AMHP service to cover existing gaps as required.
- Temporary Staff deployment to cover gaps in the AMHP service. -AMHP in existing community MH teams have increased their hours as needed to cover the gaps in the AMHP rota. However, this has impact on case load management.
- Weekly AMHP meeting -Ongoing weekly AMHP meetings to identify and resolve resource gaps.

Future Controls

Target Date

-

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CDS0018 Golland, Paul	Confidentiality, integrity or availability of LBC ICT systems is compromised by either a: <ul style="list-style-type: none"> • cyber-attack; • misconfiguration; • malware; • ransomware outbreak; • other malicious system breach; or • human error / non-compliance with GDPR. Reviewed at CMT 18/01/2022 (Risk generated 09/03/2021).	<ul style="list-style-type: none"> • LBC ICT systems become unavailable or unresponsive, resulting in critical business functions being adversely impacted for significant period of time. • LBC would incur costs in containment and recovery. • Breach of confidentiality, integrity and availability of sensitive data (including personal data, sensitive personal data and business critical data). ... 	Golland, Paul	5	4	20	4	3	12

Existing Controls

- Implemented regular vulnerability scanning, technical compliance checks and remediation. -
- Improve security collaboration & knowledge sharing (including 3rd party suppliers and partners). -Capita provision of critical infrastructure information to review and share security vulnerabilities.
- Better defined security roles & responsibilities, in particular between 3rd party suppliers and internal teams. -Negotiated cyber support & tooling contracts and defining support roles with vendors regarding O365/Azure management. (

- Business continuity plans in place for loss of essential services helps minimise disruption. -
- Cloud migration into MS/Azure environment -
- Continue to improve & test back-up & recovery processes. -
- Cyber security expert introduced via Paul Golland -
- Enhance system and environment Lifecycle & decommissioning processes. -Data centre exit completed, process and decommissioning defined/finalised.
- Enhanced system and environment lifecycle & decommissioning processes -
- Expanded vendor risk assessment and management process. -
- Identity and access management improvements implemented. -
- Improve identity and access management (AD clean up) — ongoing since Mar 2020, expected to complete Dec 2021.
- Migration of key infrastructure from legacy datacentre to cloud. -(completed May 2021).
- New cybersecurity initiative & team operating. -
- On-going review & assessment of toolsets & configuration of current software... -....
- Security-by-design approach. -
- User awareness training and communication. -

Future Controls

Target Date

- Council-wide mandatory awareness training and communication. as part of L&OD refresh Spring 2022
- Programme of systematic Penetration testing planned Q4 2021/22
- Project to revise IT business continuity plans and improve & rigorously test back-up & recovery processes – Q4 2021/2.
- Review & reconfigure current “core” software & toolsets (MS Suite) – pending O365 upgrade, target Q4 2021/2.

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
CEHR0071 Shoesmith, Dean	<p>Organisational behaviours, culture and practices lead to the Council being unable to operate effectively and therefore not serve the residents of the borough and internally within the council in accordance with their expectations.</p> <p>RISK & CONTROLS MEASURES REVIEWED BY: DEAN SHOESMITH DATE: 08/02/22</p> <p>Reviewed at CMT 18/01/2022</p> <p>Grant Thornton - 'Report in the Public Interest' recommendation number(s): 1-20.</p> <p>Reviewed DLT 2/12/21</p> <p>(Risk generated 28/10/2020).</p>	<ul style="list-style-type: none"> Increasing and uncontrollable financial loss. Legislative action due to non-compliance with statutory obligations. Workforce behaviours critically damage the organisation. Political scrutiny and interest at local and national level. Media interest at local and national level. Staff morale. Continuing and increasing reputational damage. Government intervention. <p>Employment tribunals and potential for litigation HR process Recruitment and retention of staff</p>	Shoesmith, Dean	5	4	20	5	3	15

Existing Controls

- A provider has been selected and appointed for the culture change programme -all staff will be re-inducted through to ensure the workforce as a collective is aligned to, and achieves, appropriate standards of behaviour and conduct to serve the Council's residents and customers. The provider will be commencing the design work of the programme with immediate effect and working in close collaboration with the Chief Executive, CMT and HR and OD to ensure clear objectives, milestones and outcomes are established. Target date 31/3/22
- Coaching and mentoring informal and formal -
- Corporate behaviours and ways of working are core elements -to job descriptions and new performance management system.
- Dedicated Learning & Organisational Development Team supporting culture change -as a key element to Croydon Renewal Plan with core expectations on compliance and accountability.
- Detailed policies and procedures in place and reviewed by relevant accountable officer / team regularly. -
- Governance Framework in place which is modelled on the CIPFA / SOLACE methodology. -
- Internal Audit Programme developed and delivered each financial year. -
- Ongoing engagement with staff. -
- Refreshed manager and staff behaviours and mandatory core training -including good governance and accountability framework schemes to ensure the Council maintains up to date and relevant adherence to legal requirements and initiatives as they relate to organisational best practice and workforce development and enhancement.
- Risk Management Framework in place. -
- Work is now underway for the implementation of the organisational culture change programme. - This was initiated through the appointment of external advisors and facilitators BBS in November 2021, with an initial meeting with the Chief Executive in early December and a facilitated session with CMT and the directors on 10 December 2021. There will be further facilitation sessions , including a train the trainers approach in the New Year, followed by the culture change programme being rolled out across the council via the trained trainers.

Future Controls

Target Date

- Corporate Director Assurance Statements to be provided annually. Q4 2021/22
- Corporate objectives updated to reflect new corporate standards to be launched Q4 2021/22
- Following the design of the programme with circa 25/30 staff there will be a train the trainers approach, with circa 80 staff identified to complete culture change training and development across the Council.
Target date 5/5/22
- Health & Wellbeing will be refreshed and launched winter 2021 with a focus developing manager capability in managing staff with mental health conditions
- Introduction 360 April 2022 for all managers commencing with Head of service and above and incrementally including all managers by April 2023
- The programme will include the wider culture change brought about by the May 2022 Mayoral Election. Roll out will be to CMT/Directors, followed by HOS, followed by all staff. Target date 31/5/22

- Under the Croydon renewal plan the cultural transformation programme is a key area of work that will define new behaviours Standard skills and core competencies and values that will reflect performance management and appraisal and new ways of working. All staff will be re-inducted against these standards. Target date Nov 2022
- Urgent work is being undertaken to establish a representative cross section of staff at all levels and for all directorates of the Council to form a Design Group

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CIC0005 Mitchell, Peter	<p>The investment strategy and income generating properties do not deliver the required financial benefits / targets.</p> <p>**Main Risks Croydon Park Hotel (£1.75m), Colonnades (potential £700k), Davis House (£200k), BWH (Arcadis £750k) remainder portfolio (£100k). Issue compounded by the inability of landlords to take swift action through the courts to pursue non-payment remedies**.</p> <p>Reviewed at CMT 18/01/2022</p> <p>Review & Update 19/11/2021 - CPH & College Green in active transactions (CG exchanged yesterday with disposal to complete on 17/12/2021). Colonnades, Davis House and wider portfolio currently holding performance, BWH require bid for growth following Arcadis departure but now being actively marketed and smaller letting generating interest with 1 demise u/o (£80k pa income) - wider MTFS up to date with current position.</p> <p>(Risk generated 30/10/20)</p>	<ul style="list-style-type: none"> Financial loss due to under-performance of assets through non-payment of rents due to failure of tenants, reduced rents or deferments. Service area funding / continuity of delivery could be impacted as a result of lower revenue income to support. Reputational damage due to failure of high profile assets. Political and media scrutiny. Covid-19 pandemic and Brexit significantly impact on investment properties and the general rental income across the wider portfolio leading to reduced revenue generation. Inability of landlords to take swift action through the courts to pursue non-payment remedies 	Mitchell, Peter	4	5	20	4	5	20

Existing Controls

- Clear and agreed (Scrutiny & Cabinet) strategy in place. -Strategy incorporates CIPFA recommendations.
- Croydon Park Hotel disposal imminent Dec 2021. -
- New ways to utilise properties to secure longer term security being investigated. -
- Revised Corporate Asset Strategy in place to help focus resources in the most appropriate way. -The effectiveness of this strategy is dependent on result of Capitalisation Directive award from MHCLG.
- Spending strategy stopped with immediate effect for any more investment purchases. -
- The Asset investment strategy is included within the Asset Management Plan -ensuring proper governance which will include regular quarterly reporting to effectively monitor any impacts.

Future Controls

- Future controls to be confirmed by risk owner

Target Date

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CIC0008 Mitchell, Peter	Wholesale gas and energy costs increasing and risk of continual increases placing unsustainable financial burden on the council, in addition that school energy recharges are recovered. Reviewed at CMT 18/01/2022 Review & Update as at 19/11/2021 - Team Leader (Sustainability & Energy) is proactively looking at alternatives as LBoC is on Fixed pricing schedule until 31/03/2022. Gas is the key area, as bulk suppliers have little storage capacity due to UK closure of much of storage facilities and capacity relying on piped liquified gas, which is under strain due to increased global demand from Asian Continent.	Financial impact on the council	Mitchell, Peter	5	4	20	5	4	20

Existing Controls

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

Future Controls

- Reviewing Energy Strategy On Green / Sustainability agenda
Lower CO2 footprint
Seeking Carbon Neutral opportunities

Target Date

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
CIC0010 Mitchell, Peter	Risk of financial loss and reputational damage due to the poor performance of Brick By Brick including the Fairfield Halls refurbishment project Reviewed at CMT 18/01/2022 Reviewed by owner 19/11/21. Reported to CMT/Leader w/c 15/11/2021 (Risk generated 19/05/2021).	<ul style="list-style-type: none"> • Council is liable for the outstanding debt. • Political and media scrutiny and interest. • Financial loss on sale of BxB assets. • Loss of interest on loan payments 	Mitchell, Peter	5	4	20	4	4	16

Existing Controls

- Revised loan agreement to Brick by Brick (excluding Fairfield Halls) - Loan agreement setting down rights and obligations of parties.
- Separate bank account established for accrued interest on loans provided by Council
- Regular Operational meetings between company & Council and Shareholder board

Future Controls

- Additional Management support to be considered for Brick by Brick during managed wind down of the company. Additional third-party support for the build out of certain sites being engaged.
Review December 2021
- Supplementary external help to close out Fairfield Hall Contract dispute and project manage completion of works Timescale to be appted Dec 2021

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
ED0001 Davies, Shelley	Increasing population with complex learning needs and parental expectations leads to rising demand and financial pressure on SEN fixed budgets including pressure on High Needs Dedicated Schools Grant (DSG) budget, which can't be funded from General Fund reserves. (The School and Early Years Finance (England) Regulations 2020 established a statutory requirement for any DSG deficit balance to be held within the local authority's overall DSG, meaning authorities cannot fund deficit from general fund without Secretary of State approval).... Reviewed at CMT 18/01/2022 Risk created 17/9/2019.	<ul style="list-style-type: none"> • Children and families do not receive the advice and support they would expect. • Increased costs due to tribunals and complaints leading to reduced reputation. • Inability to achieve outcomes for children and families in Croydon. • LBC over reliance on 'independent sector'. • Increase in Education, Health & Care (EHC) Plans issued with no additional funding provided. • Specialist placement pressures may result in young people with profound disabilities requiring provision out of borough at additional cost to the Council. 	Davies, Shelley	5	4	20	5	3	15

Existing Controls

- 0-25 SEND Strategy Implementation Plan to deliver change across the system. -
- Addington Valley Academy Free School opened in temporary site for Year 7 (September 2020). -
- Addington Valley Free School open on substantive site for all year groups -
- Continue to use Council Members / MP's to lobby Central Government -for a review of the model that funds higher needs to reflect the actual demand for Croydon.
- Delivery of training for travel providers in supporting PMLD and any other pupils requiring APG treatments -- and how to maintain safe Covid 19 Health practices should this be required.
- DSG Recovery Plan (balanced budget 2024/25) approved by Schools forum. -
- Early Identification and Intervention –improved HV assessment, identify needs, work with families early. -Support provided for EY education providers, personalised inclusion funding until the end of EY Foundation Stage.
- Free School opened which will relieve pressure in spend in non-mainstream sector. -
- Further senior management review of existing plans. -.
- Graduated response – right support, right time. -Meeting needs locally in local schools at SEN Support level; reduced reliance on alternative education.
- Implement strategies for managing demand for more effective mainstream school placements. -
- Implementation of joint working with other local authorities to reduce placement costs. -South London dynamic purchasing system (SL DPS).
- Improved forecasting and reporting of demand led spend to manage overall budget position. -
- Improved projections for school places. -
- Joint Working – children's needs are being met locally in Croydon (cost avoidance in independent sector), -through co-ordinated and coherent pathways which are achieved through collaborative work with parents and YP; across education, health and care.
- July 2019 -5 yr deficit recovery plan submitted to DfE.
- Modelling of Locality Based Working - & Staged Approach supporting mainstream schools meeting SEN needs.
- Post 16 pathway development providing effective local education, care and health pathways to adulthood, -and EHC Plans are ceased in timely way (currently 40% HNB spend is post 16).
- Post 16 specialist placements provision created at Coulsdon College for pupils in Sept 2019. -
- SEN strategy 2019 - 2022 presented and approved by Cabinet March 2019 -following consultation. Plans to improve impact of service and measure to mitigate against cost.
- South London Partnership SEN Commissioning Programme in place -for commissioning residential and day placements for children and young people with Special Education Needs.
- Utilised the additional funding allocated in the 2019 'Spending Review'. -

Future Controls

- High Needs Funding Review planned Jan 2022 ...

Target Date

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
ED0003 Davies, Shelley	The number of Council maintained schools moving into a financial deficit leading to default and arrears continues to increase. Decrease in pupil numbers is further impacting on school budgets and likelihood of moving into financial deficit. RISK & CONTROLS MEASURES REVIEWED BY: Director Shelley Davies DATE: 21/02/2022 Reviewed at CMT 18/01/2022 (Risk generated 08/08/2017).	• Financial loss to LBC as the Council holds liability to settle deficit should schools transfer to academy status.	Davies, Shelley	4	5	20	4	5	20

Existing Controls

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

Future Controls

- School Resource Management Advisor to target meetings with additional school leadership teams and Chair of Governors to review deficit action plans during the start of Autumn term and provide advice to bring budgets in line. Review December 2021

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HO0003 Padfield, David	The Council does not meet its statutory obligations for the delivery of the General Building Works across the HRA estate. Reviewed at CMT 18/01/2022 (Risk generated 30/10/2020).	<ul style="list-style-type: none"> • Unsafe buildings. • Enforcement action against the Council by regulatory bodies. • Political scrutiny and interest at local and national level. • Media interest at local and national level. • Substantial financial loss. • Serious incident / injury. 	Padfield, David	5	4	20	5	4	20

Existing Controls

- ARK external independent investigation completed May 2021 and actively implementing recommendations. - Tenants group considering implementation of White Paper 'Charter for social housing residents'
- Tenants/scrutiny panels established in conjunction with housing function
- Residents panel established for the Regina Road meeting twice weekly
- Priority to ensure all key safety areas are being covered focusing on the gas, electricity, fire, lifts, legionella and asbestos checks
- Clear KPIs in situ
- Rigorous review of maintenance contract and contract management
- Actively working with Regulator for Social Housing to ensure correct approaches being taken
- Door-to-door checks with residents implemented

Future Controls

Target Date

- Develop better systems for recording maintenance requests / tenant complaints. Condition survey on seven high priority blocks
- Reviewing all housing contracts including Axis, Mulalley, and Echelon Consultancy
- Detailed improvement plan being developed involving a number of staff in housing department
- Review of resident engagement and improvement board to be established.
- Overarching HRA business plan to be developed and published target date March 2022
- Leader of the Council dialogue with C Exec of Axis to be concluded Q4 2021/22

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HO0004 Padfield, David	<p>Major increase in disrepair cases raised under the disrepair protocol and as a result of The Homes (Fitness for Human Habitation) Act 2018.</p> <p>**Act requires landlords to ensure that homes are fit for human habitation and is the most significant change in the law relating to housing conditions since the Housing Act 2004. The first phase of these provisions came into force in March 2019 and new tenancies granted since then have been subject to the new legislation.**</p> <p>Reviewed at CMT 18/01/2022</p> <p>(Risk generated 13/05/2021).</p>	<p>Currently disrepair claims are brought in accordance with the well-established 'pre-action protocol for disrepair claims'. An increase in repair claims which could be driven by:</p> <ul style="list-style-type: none"> • Increased awareness of the ability to claim and to get compensation driven in part by targeted and aggressive advertising and social media campaigns by law firms and claims companies. • The cut to legal aid, as a result a number of law firms have change tactics to increase their revenue by concentrating resources into disrepair cases and we have seen an increase in solicitors door knocking and reported two firms to the Bar Council. • The Homes (Fitness for Human Habitation) Act 2018 which came into effect April 2019. • Cases where we have not due to other maintenance priorities addressed problems with the external fabric of our buildings. This requires an ongoing programme to address rendering failures, DPC, Cavity insulation and roofing renewal. <p>There has been a significant increase in disrepair cases in the last year and in costs. Claims are predominantly (around 95%) related to damp and mould.</p>	Padfield, David	5	4	20	5	4	20

Existing Controls

- Analysis of the disrepair cases in the last year has -changed the process that has been in place with maintenance contractor to ensure all reports of damp are inspected and that the Council separate the issues of dampness vs those caused by ongoing leaks.
- Disrepair cases are managed by the Disrepair surveyor and supported by the Senior surveyor -and Technical Manager in the Technical Team. Approval to appoint an agency disrepair surveyors has been granted

Future Controls

Target Date

- Resources for disrepair work are being urgently reviewed as part of re-organisation of the service Q4 2021/22
- Review use of de-humidifiers and monitors with Asset Management Team to increase use of emerging damp monitoring technology and industry improvements. Q3 2021/22.

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
MO0002 Jones, John	Saving options for governance review: Dem Services unable to deliver renewal plan targets RISK & CONTROLS MEASURES REVIEWED BY: JOHN JONES DATE: 09/02/22	Financial impact or unable to deliver the governance improvements expected	Jones, John	4	5	20	3	4	12

Existing Controls

- Awareness and reporting via -improvement plan risk register

Future Controls

- Growth bid and budget setting process escalate to Exec Director and/or Deputy S151 officer

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
MO0003 Jones, John	Resources in Democratic services are under significant strain combined with increased demands on the service leading to the risk that statutory minimum standards are not met in relation to the production of committee papers and report packs and meeting our constitutional minimum standards. Growth in demand due to changes and enhancement of governance and the Croydon renewal plan. New staff and existing staff supporting 25% more meetings than originally resourced and meetings lasting longer and more complex including advice and induction of new Members. RISK & CONTROLS MEASURES REVIEWED BY: JOHN JONES DATE: 09/02/22	Staff working significant more hours into evenings and Annual leave necessarily interrupted leading to TOIL accumulated A cumulative impact on staff of increasing demand, and risk of staff 'burn out' Statutory minimum standards could be challenged in relation to the production of committee papers and report packs and meeting our constitutional minimum standards.	Jones, John	4	5	20	3	3	9

Existing Controls

- Additional support has been provided to tackle backlog of minutes and cover staff vacancies -
- Current prioritisation over 6 week forward plan also -use more junior staff to cover more senior staff (also exploring overtime via SCP)
- David Corcoux developed paper on this issue. -

Future Controls

- Additional staff resources paper being prepared for ELT. Plan to provide a break/respice for staff members.
- Try to reduce existing demand on service and future demand by prioritising/stop doing some activities, currently under consideration

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
MO0004 Jones, John	Failure to implement new governance model for the Council associated with directly elected Mayor in May 2022 RISK & CONTROLS MEASURES REVIEWED BY: JOHN JONES DATE: 09/02/22 Reviewed at CMT 18/01/2022 Risk generated 5/11/21	Legal/statutory, reputational and service disruption for the Council and Borough.....	Jones, John	5	4	20	5	4	20

Existing Controls

- Governance working group currently set up -.....

Future Controls

- Regular meetings of the WG are held to ensure that work streams are meeting deadlines and where deadlines are not being met that corrective action is taken. Meetings are scheduled through to May 2022.

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PH0007 Flowers,Rachel	<p>The spread of the C-19 infection and the nature of the interventions implemented to reduce it widen health inequalities and increase demand on all Council services. (The omicron variant with it's increased communicability has added another impact of this pandemic with fast transmission even for those who have received 2 vaccinations)</p> <p>** e.g. overcrowded/poor housing - less effective self-isolation; those in deprived areas more likely to have underlying conditions; unsecure employment leading to great financial insecurity**.</p> <p>RISK & CONTROLS MEASURES REVIEWED BY: RACHEL FLOWERS DATE: 9/2/22</p> <p>Reviewed at CMT 18/01/2022</p> <p>(Risk generated 24/03/2020).</p>	<ul style="list-style-type: none"> Increasing demand on Council services as this occurs. Increased mortality and morbidity in more vulnerable groups. Adult Social Care pressure. Housing demand. Political and media interest. 	Flowers,Rachel	5	4	20	5	3	15

Existing Controls

- Targeted comm's and engagement to the 'at risk' populations / vaccination uptake work included. -
- Council wide Inequalities programmes including Local Strategic Partnerships (LSP). -
- COVID-19 and flu messaging detailed in the NHS Health Check invitation letter sent to people aged 40-74. -
- Deep dive with data to identify if there are patterns around testing -e.g. people not accessing testing or testing positive e.g. community clustering.
- Director of PH is Regional Lead for London (ASC) and briefing LSP / ELT / GOLD on epidemiology -and control measures.
- Epidemiology data provided by DHSC and LCRC reviewed by PH Team on a daily basis to enhance understanding. -
- Free school meal vouchers. -
- Good engagement across borough with C19 Health Protection Board that provides oversight -to the Outbreak Control Plan.
- Lower level risks discussed on regular basis at SILVER and escalated where necessary. -
- The Outbreak Control Plan operating to ensure that there is coordinated approach to provide -effective delivery across the borough in a coordinated and targeted process.
- Ward level Power BI dashboard analyses data at a local level. -

Future Controls

- Achievement of coverage for all age categories under the mass vaccination programme. Including 12-15 Age Group Anticipated completion Dec 2021.

Target Date

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
PP0014 Handford, Gavin	Performance data provided via some corporate systems and processes is inaccurate and incomplete. Reviewed at CMT 18/01/2022 Risk generated 01/06/2020.	<ul style="list-style-type: none"> Inaccurate / misleading reporting. Financial loss. Reputational damage. Political and media scrutiny..... 	Handford, Gavin	5	4	20	5	3	15

Existing Controls

- Data validation activities to ensure accuracy. -
- Enhanced review of data recording in place to identify appropriate strategies to mitigate. -
- Establishment data corrected within My Resources. -
- Managers dashboards are available for key workforce information on MyResources. -
- Monthly finance reporting in place. -
- Performance framework aligned to Croydon renewal activated. -
- PMO activity to coordinated reporting. -
- Review of existing data recording practices / processes to ensure accuracy. -....
- Workstream initiated to ensure activities are appropriate. -

Future Controls

- Subject experts to be engaged to workflow current practices and identify control weaknesses more info?????

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
RCS0036 Ennis, Richard	Ineffective management of identified risk leads to organisational failure. Reviewed at CMT 18/01/2022 Grant Thornton - 'Report in the Public Interest' recommendation number(s):1-20. Reviewed by risk owner 16/11/21 (Risk generated 23/03/2020).	<ul style="list-style-type: none"> • Inaccurate risk reporting leads to risk materialisation and consequences associated with them. • Service disruption, death or serious injury. • Political and media interest and scrutiny. • Leadership Team (senior officer / Cabinet Member) resignations / potential legislative action taken against individuals. • Continuing and increasing financial loss. • Public unrest / disorder. • Legal action against Council instigated. • s.114 Notice submitted. • Political scrutiny (national level). • Media interest and scrutiny. • Regulator criticism. 	Ennis, Richard	5	4	20	5	4	20

Existing Controls

- Continuous horizon scan review of national and global events / trends. -
- Effective risk recording / reporting mechanism in place allowing for 'high level Risk Register reporting to leadership. -CMT are accountable for successful delivery of the Council's Risk Management Framework.
- Frequency of management oversight of risk register has increased at a senior level in line with demand. -
- Rapidity of escalation to CMT amended to achieve desired outcome. -
- Risk is standing item on regular CMT risk reviews. -
- Robust corporate Risk Management Framework in place. -

Future Controls

Target Date

- Further provision of risk management training to Officers and Members to be implemented as the senior leadership team takes shape. Q4 2021/22

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
VRN0024 Aspinall, Kristian	<p>A rise in domestic abuse in the borough resulting in greater numbers of murders and serious harm.</p> <p>Referrals February 2021: 66 high harm high risk (Multi-Agency Risk Assessment Conference (aka MARAC)).</p> <p>Risk Reviewed by owner 17/01/2022. Current MARAC referrals for January 2022 = 55</p> <p>Current MARAC referrals for the month of January 2022 = 75</p> <p>Reviewed at CMT 18/01/22</p> <p>(Risk generated 25/06/2018).</p>	<p>Death or serious injury to clients and their children / families.</p> <ul style="list-style-type: none"> Financial loss due to increase in the pressure on inter-related services as well as DASS. Legislative action. 	Aspinall, Kristian	4	5	20	5	3	15

Existing Controls

- Feb 2021 - The council sought agreement to a refreshed approach from the partners in the learning the lessons from domestic homicides in the borough. -Community Safety Partnership to the recommendations from Domestic Homicide reviews. This should give new focus from partners to
- Action plans for Safer Croydon Partnership. -- Action plans for Safer Croydon Partnership. -
- Action plans for the Council's Domestic Abuse Support Service (DASS). -
- Active management of workloads and pressures on staff . -
- Commissioning of DRIVE service provider. -
- Community Safety Strategy -The new Community Safety Strategy is being agreed at cabinet on the 15th November 2021, and includes specific actions and updates to our approaches on domestic violence and efforts to reduce long term causes of violence.
- Contingency location identified if move is delayed. -
- Crime & Disorder Reduction Strategy. -
- Domestic Homicide Reviews -We have agreed the funding for our domestic Violence Homicide reviews as of WB 11 /11/2021, and this will be taking place in the coming months. Any actions resulting of these will be captured in an ongoing partnership action plan, and they will be quality reviewed by the Home Office as per protocol .
- FJC -Advocates for victims of domestic abuse and sexual violence White Ribbon Borough and petition.
- FJC team working with victims and putting in place new advocacy measures -
- High number of referrals for MARAC (VAWG pan London) -We will be developing a VAWG Strategy The Police will increase their presence in Town Centres across London MARAC's will continue to be held weekly to manage the volume Secured MOPAC funding for 2 additional IDVA's to assist in managing MARAC capacity and support our mental health and childrens services .
- MARAC and DAPP processes in place. -Occurring weekly to manage increased referral volume.
- Plans in place for prevention and support -
- Presented to GPAC for full review and scrutiny 26/04/2021. -
- Strategic Assessment -Our strategic assessment was refreshed in March 2021. Although not published externally due to the sensitive nature of its contents, the findings of the SA were used in the development of the Community Safety Strategy outlined in action 1), and it continues to be the basis for evidence led decision making across the Croydon Safer Partnership.
- The Council's domestic violence conducts annual refresh of their own specific strategy and work programme -

- Action plans for the Council's Domestic Abuse Support Service (DASS). -
- Active management of workloads and pressures on staff. -
- Commissioning of DRIVE service provider. -
- Community Safety Strategy -The new Community Safety Strategy is being agreed at cabinet on the 15th November 2021, and includes specific actions and updates to our approaches on domestic violence and efforts to reduce long term causes of violence.
- Contingency location identified if move is delayed. -
- Crime & Disorder Reduction Strategy. -
- Domestic Homicide Reviews -We have agreed the funding for our domestic Violence Homicide reviews as of WB 11/11/2021, and this will be taking place in the coming months. Any actions resulting of these will be captured in an ongoing partnership action plan, and they will be quality reviewed by the Home Office as per protocol.

- Family Justice Centre -Advocates for domestic abuse sufferers. White Ribbon Borough and petition.
- FJC team working with victims and putting in place new advocacy measures -
- High number of referrals for MARAC (VAWG pan London) -We will be developing a VAWG Strategy
- The Police will increase their presence in Town Centres across London
- MARAC's will continue to be held weekly to manage the volume
- Secured MOPAC funding for 2 additional IDVA's to assist in managing MARAC capacity and support our mental health and childrens services.

Target date 31/5/22

- MARAC and DAPP processes in place. -Occurring weekly to manage increased referral volume.
- Plans in place for prevention and support -
- Presented to GPAC for full review and scrutiny 26/04/2021. -
- Strategic Assessment -Our strategic assessment was refreshed in March 2021. Although not published externally due to the sensitive nature of its contents, the findings of the SA were used in the development of the Community Safety Strategy outlined in action 1), and it continues to be the basis for evidence led decision making across the Croydon Safer Partnership.
- The Council's domestic violence conducts annual refresh of their own specific strategy and work programme -
- The work of the Family Justice Centre. -
- Working with the Police and other public agencies to increase referrals. -

Future Controls

Target Date

- Completion of Croydon's VAWG strategy – end of 2022
- Annual Strategic Assessment The Council's annual strategic assessment will be published this will provide an evidence base to council practitioners and partners to better understand prevalence and types of domestic abuse across the borough.
Winter 2021/22
- Community Safety Strategy - Safer Croydon Partnership Council will lead on the development of a new Community Safety Strategy for the Safer Croydon Partnership. Given our high and rising rates of domestic abuse it is likely to be a central area of focus.
(Ongoing during 2021).
- Council will lead on the development of a new Community Safety Strategy for the Safer Croydon Partnership. Given our high and rising rates of domestic abuse it is likely to be a central area of focus.
(Ongoing during 2021).
- Domestic Homicide Review findings pending following statutory review. Winter 2021/22
- Domestic Homicide Review findings pending following statutory review. Winter 2021/22
- The Council's annual strategic assessment will be published this will provide an evidence base to council practitioners and partners to better understand prevalence and types of domestic abuse across the borough.
Winter 2021/22