

Risk Register: Corporate Risks

Periods -->	Last reviewed	01/01/2019 to 31/03/2019
R.14 HR Policies <i>Owner: Iain Newman</i> Legal Challenge to HR policies e.g. Holiday pay	09/02/17	MODERATE (8)
		Reviewed by Corporate Board 25 th June 2019, no changes made.
A.863 Specialist legal advice and support. <i>Owner: Iain Newman</i>		Annual Review of Equal Pay claim and Holiday Pay Claims scheduled for September 2019
R.15 The Council budget <i>Owner: Iain Newman</i> The Council may be unable to set and/or manage its budget so as to meet its statutory obligations within the resources available.	26/07/17	MAJOR (20)
		Reviewed by Corporate Board 25 th June 2019, no changes made.
A.864 Financial intelligence <i>Owner: Rachel Cooper</i>		Finance attend regional and national events as appropriate. We are also a member of SIGOMA
A.866 Monitoring and forecasting of council tax and business rates <i>Owner: Sean Beckett</i>		Reviewed on a monthly basis. Council tax slightly below target; business exceeded target.
A.869 Reports to Cabinet, Scrutiny, Audit & Standards and Council on budgets <i>Owner: Iain Newman</i>		Budget approved by Full Council 25 th February 2019.
A.947 Strategy to manage numbers of Looked After Children through partnership and improved early intervention <i>Owner: Helen Ellis</i>		

A.3181 Monitor financial stability of Better Care Fund (various) <i>Owner: Matt Bowsher</i>		Control added by Corporate Board following review on 25th June.
R.18 Information Governance <i>Owner: Iain Newman</i> The Council may fail to; assess the importance of information to the business and may be unaware of the potential impact on the organisation should the confidentiality, integrity or availability of information be compromised.	09/12/14	SIGNIFICANT (12)
		Reviewed by Corporate Board 25 th June 2019, no changes made.
A.907 Maintain standards of Information Governance and Transparency through the Information Governance Board <i>Owner: Lewis Bourne</i>		Data Management & Insight Strategy approved by Corporate Board. Governance structures now being considered and some actions commenced.
A.908 Corporate Information Governance Team <i>Owner: Iain Newman</i>		Impact of GDPR has led to an increase in Subject Access Requests being received by the Team and issues being referred to the Information Commissioner. Additional self funded from Traded Service IG Officer starting June 2019.
A.909 On line Data Protection <i>Owner: Lewis Bourne</i>		Identification of "crowd funded" content to provide easy to digest online GDPR/Info Gov/Cyber Security Training. Working with consortium of LA's being progressed.
A.910 Escalation of Information Governance issues <i>Owner: Iain Newman</i>		Escalation routes for IG issues remain through CIGT, DPO and IG Board. Increase in issues raised with the Information Commissioner to be discussed.
A.911 Action plan for compliance <i>Owner: Lewis Bourne</i>		Programme of internal GDPR adequacy audits progressing. Service specific Privacy Notices published and other areas of Action Plan concluded i.e. Breach reporting process in place, Data Protection Impact Assessments in place. RoPA being developed.
R.20 Welfare Reform <i>Owner: Iain Newman</i> There is a risk that various changes to welfare and benefits systems could place	28/06/16	SIGNIFICANT (15)
		Reviewed by Corporate Board 25 th June 2019, no changes made.

people at risk and increase pressures on statutory services.		
A.752 Corporate Welfare Reform Board in place to take a strategic approach <i>Owner: Sean Beckett</i>		Last board meeting was 27th February 2019 and the next is scheduled for 24th April 2019.
A.753 Increased provision for bad debt (Housing Services) - Corporate risk action <i>Owner: Catherine Ludwig</i>		Appropriate bad debt provision set within approved budgets. Outturn improved compared to budget as arrears reducing.
A.754 Joint working with third sector and other partners to identify & support people affected by Welfare Reforms - Corporate risk action <i>Owner: Catherine Ludwig</i>		Ongoing, including Corporate Welfare Reform group, continued regular meetings with DWP (jobcentre managers, service centre managers and partnership manager) plus continued liaison with DWP.
A.755 Review housing stock to balance supply and demand - Corporate risk action <i>Owner: Catherine Ludwig</i>		Ongoing - asset management strategy and long-term budget planning continue.
A.2839 Council Tax Reduction Scheme Review <i>Owner: Sean Beckett</i>		Scheme for 2019/20 to remain as is. Focus now on scheme for April 2020. Partner identified and agreed and modelling tool purchased.
A.3199 Strengthen Families Programme (known nationally as Troubled Families) enables and assists families in meeting progress to work criteria <i>Owner: Helen Ellis</i>		Control added by Corporate Board following review on 25th June.
R.21 Corporate Fraud <i>Owner: Iain Newman</i> The Council acknowledges that there is a risk of fraud across all areas of its operations and is working both internally and with external partners to prevent and reduce this risk.	15/04/15	MODERATE (8)
		Reviewed by Corporate Board 25 th June 2019, no changes made.

<p>A.1572 Anti Fraud and Corruption Plan <i>Owner: Graham Harrison</i></p>		<p>A report has just been delivered to Audit and Standards Committee on the work undertaken on Fraud and Corruption during 2018. Audit and Standards Committee have recently approved a new Fraud Action Plan.</p>
<p>R.22 Vulnerable People. <i>Owner: Martin Samuels</i> Risk of failure to protect children and/or adults in positions of vulnerability, due to increasing demand, changing patterns of abuse (e.g. child exploitation) and reducing resources.</p>	<p>29/07/19</p>	<p>SIGNIFICANT (15) Reviewed by Corporate Board 25th June 2019, no changes made to the risk rating.</p>
<p>A.953 Improved usage of data and intelligence to identify and address patterns of abuse and increase the effectiveness of Early Help <i>Owner: Helen Ellis</i></p>		
<p>A.2555 Current referral pathway for MASH is multi agency and Care Act compliant <i>Owner: Stephen Lonsdale</i></p>		<p>Localised policies in place to ensure agencies continue to make safeguarding personal through sharing information, training staff and auditing agency case records. In particular, this has resulted in new referral forms for safeguarding concerns and Safeguarding Adult Reviews which are embedded and Care Act compliant. The Safeguarding communications and engagement sub group is directly engaged in shaping appropriate documentation for referrals and training.</p>
<p>A.2557 Strategic safeguarding training and social media strategy is established. <i>Owner: Stephen Lonsdale</i></p>		<p>Safeguarding communications and engagement sub group involved in maximising opportunities.</p>
<p>A.2567 Performance is scrutinised through the Children's Service Improvement Board, the Department for Education (DfE) and Ofsted on a regular basis <i>Owner: Helen Ellis</i></p>		
<p>R.137 Health & Safety</p>	<p>05/02/18</p>	<p>MODERATE (10) Reviewed by Corporate Board 25th June 2019, no changes made.</p>

<p><i>Owner: Iain Newman</i> Failure to have in place effective arrangements for managing health and safety leading to risks to Council staff, service users and visitors to Council premises</p>		
<p>A.1593 Effective information, instruction and training <i>Owner: Simon Reece</i></p>		<p>Health & safety management training programme in place. IOSH-accredited Safety for Executives & Directors training programme – 2 further sessions were planned to mop up those unable to attend earlier sessions. One session still to take place (17 April). Only 3 officers in target group will not have attended this training. This will be reported to CO – F&L.</p>
<p>A.1594 Effective Planning & Implementation <i>Owner: Simon Reece</i></p>		<p>Corporate Health & Safety Action Plan is a regular item on CHSMG agenda. Review scheduled to be reported to April meeting of CHSMG. Considerable development taking place with Directorate & Divisional level action plans which are on agendas of appropriate management team meetings. Development & progress is reported at quarterly management group meetings.</p>
<p>A.1595 Effective Health & Safety organisation <i>Owner: Simon Reece</i></p>		<p>Governance structure for health & safety management is in place at corporate, directorate & divisional levels.</p>
<p>A.1596 Effective monitoring & auditing <i>Owner: Simon Reece</i></p>		<p>Quarterly monitoring of health & safety performance is included in quarterly health & safety reports produced for management teams by CHST. New online incident reporting system has capability of producing real time information for management. Link to EWS to record violent incidents is now featured on system. Audit (health & safety compliance review) programme is underway. Reports & action plans are delivered to Divisional management teams (or school management teams) for action.</p>
<p>R.234 Emergency Planning <i>Owner: Deborah Harkins</i> Failure to implement emergency planning and business continuity arrangements will increase the inability of the local authority to respond and recover from incidents.</p>	<p>21/12/17</p>	<p>SIGNIFICANT (12) Reviewed by Corporate Board 25th June 2019, no changes made.</p>

<p>A.2033 Develop corporate protocol and support the implementation of emergency evacuation procedures across all Council operated premises <i>Owner: Barry Jones/Sarah Hill</i></p>		<p>Corporate Health & Safety are running a series of Emergency Incident Response Workshops which are designed to provide building managers and lead building officers with the necessary information for the implementation of emergency incident response plans to protect staff and other occupants within their buildings. Further training in the Emergency Incident Response Procedure for persons that will be identified as 'Incident Controllers' will follow these workshops with input from the West Midlands Police CTU</p>
<p>A.2034 Ensure elected members are equipped to carry out responsibilities for managing and recovering from civil emergencies <i>Owner: Barry Jones/Sarah Hill</i></p>		<p>Managing & Recovering from Civil Emergencies training for Elected Members is conducted annually and resources are available on the Members Portal. The Leader, Cabinet Members and Shadows are invited to training/exercising events.</p>
<p>A.2036 Support the organisation's resilience in meeting its business continuity management obligations <i>Owner: Barry Jones/Sarah Hill</i></p>		<p>A review of the BCM Toolkit has been undertaken and areas of improvement have been identified to support the Council's business continuity arrangements, which includes guidance to ensuring contracted out services have sufficient business continuity arrangements in place. Version 2 of the BCM Toolkit was published in January 2019. A Service Area Critical Functions Report has been developed which identifies the critical functions determined by each Directorate and prioritises the business activities and services for recovery. Currently exploring options of storing BC Plans independently of the Council's network for senior officers to access in the event of an IT failure. The emergency planning team continue to offer a half day table top exercise to help services evaluate effectiveness of their BC Plans.</p>
<p>R.242 Management Capacity <i>Owner: Kevin O'Keefe</i> Capacity, there is a risk that the Council's capacity to support delivery of its priorities or take advantage of emerging opportunities may become insufficient. This presents a risk that services supporting vulnerable people fail to meet statutory requirements, a loss of potential regeneration investment into the borough, increases in workforce stress, customer</p>	<p>None</p>	<p>MODERATE (9) Reviewed by Corporate Board 25th June 2019, no changes made.</p>

dissatisfaction and diminishing political support.		
A.2084 – The Council has medium term (3 year) Chief Officer Business Plans, which include workforce plans, designed to show how capacity is aligned appropriately to the delivery of statutory and priority services. <i>Owner: Jacqueline Branch</i>		
A.2085 There is a robust Performance Management Framework and supporting system embedded in the Council, managed by the Transformation Team. <i>Owner: Jacqueline Branch</i>		
A.2861 Where capacity appears to be insufficient to meet increased, new or emerging demand, the use of interim capacity will be considered, based upon an assessment of the implications of failing to address/cater for increased demand on management capacity. <i>Owner: Alan Lunt</i>		
R.243 Major ICT Projects. <i>Owner: Iain Newman</i>	21/12/17	SIGNIFICANT (12)
There is a risk that the transformation of the Council rests on a number of significant ICT Projects. These projects carry a risk of failing to delivery their aims, cost overrun, being ineffective and/or disruption to the current business. E.g. Digital Platform and PIMS.		Reviewed by Corporate Board 25 th June 2019, no changes made.
A.2087 Each ICT programme is supported by a business case, project plan, risk and issues register, and performance is		

<p>managed against these. Risks are continually monitored and corrective action taken if any develop into issues <i>Owner: Sandra Taylor</i></p>		
<p>A.3192 Successor project - Full governance review has been undertaken, the correct level of programme controls are now in place and managed by the PMO <i>Owner: Martin Samuels</i></p>		Control added by Corporate Board following review on 25th June.
<p>R.286 Payroll <i>Owner: Alan Lunt</i> Failure to address the actions in the internal audit report may result in staff not being paid or not being paid correctly</p>	N/A	MAJOR (20)
		Reviewed by Corporate Board 25 th June 2019, the rating was increased from 16 to 20.
<p>A.2554 If necessary, the previous payroll months would be applied, with priority efforts concentrated on new starters and over payments. Where required supplementary CHAPS payments will be made <i>Owner: Jayne Catley</i></p>		The absence calculations for the payrolls are run individually and weekly to mitigate the risk of a calculated payroll update provided by 30th May 2019 by Jayne Catley
<p>A.3169 Payroll, ICT and Finance are working closely to identify the root causes of the issues. <i>Owner: Jayne Catley</i></p>		Control added by Corporate Board following review on 25th June.
<p>R.287 Payment Card Industry (PCI) Compliance <i>Owner: Iain Newman</i> If the Council is unable to stay Payment Card Industry Compliance (P.C.I) , several risks may arise/be incurred: financial penalties, reputational damage and the</p>	N/A	MAJOR (16)
		Reviewed by Corporate Board 25 th June 2019, no changes made.

Council's approach to income collection impeded As above risk narrative		
A.2561 Specialist security consultants commissioned to conduct a review and provide report <i>Owner: Sandra Taylor</i>		Work continues to progress well, consultants are fully engaged and working with our teams. It is anticipated the 2 SAQ will be completed and submitted June. (E-Commerce & Automated Telephone Payments). Work on the PDQs is progressing too and it is hoped this will be available for assessment and submission mid June. Customer not present, i.e. the taking of payments over the phone in contact centres or contact points is likely to be September as this requires infrastructure change, implementation of Semaphore and Civica changes.
A.2562 Icon Programme Board to review all payment methods and revisit preferred methods of taking payments <i>Owner: Rachel Cooper</i>		External assessor engaged and working closely with IT. Technical solutions are being explored
R.288 Multi Speciality Care Provider (MCP) <i>Owner: Martin Samuels</i> There is a risk that the MCP will be delayed or not take place at all due to changes in national policy or current challenges in the local NHS system. This would result in reputational and financial issues and threaten the delivery of existing MTFS savings	10/12/18	SIGNIFICANT (12)
		Reviewed by Corporate Board 25 th June 2019, no changes made.
A.2564 Council involvement in procurement, mobilisation and assurance processes, underway. Chief Officer, Finance & Legal attend MCP Procurement Board <i>Owner: Deborah Harkins</i>		
A.2565 Development of contingency plan for alternative integration of service <i>Owner: Deborah Harkins</i>		

<p>A.2868 Dudley Council to engage with Government, NHSE and respond to consultations to raise awareness of benefits of the MCP for Dudley residents <i>Owner: Deborah Harkins</i></p>		
<p>R.306 Brexit <i>Owner: Alan Lunt</i> There is a risk that various changes to Economic, procurement and environmental policies as a result of Brexit could place pressure on the Council's capability to effectively deliver adequate services and / or address significant increases in demand</p>	<p>15/04/19</p>	<p>MAJOR (16) Reviewed by Corporate Board 25th June 2019, rating increased from 12 to 16.</p>
<p>A.3180 The Council will continue to monitor the social care workforce via the annual National Minimum Dataset and will workforce plan in partnership with Black Country Authorities to mitigate the potential impact of a decreased workforce <i>Owner: Matt Bowsher</i></p>		<p>Control added by Corporate Board following review on 25th June.</p>
<p>A.2859 Deputy Chief Executive chairs a Corporate Brexit Group tasked with determining the impact of Brexit (either as agreed with the EU or No Deal) on the Council and to put in place measures to mitigate the impact on services <i>Owner: Alan Lunt</i></p>		<p>Dudley Brexit Risk Register contains all issues highlighted through discussion in the Brexit Group. Ongoing monitoring of key issues through Brexit group, thematic leads aligned through WMCA and Local Resilience Forum. Weekly reporting of issues (by exception) via Chief Exec led regional groups, likewise LRF reporting.</p>