
Audit and Standards Committee – 20th September 2021

Report of the Director of Finance and Legal

Corporate Risks Report

Purpose

1. To discuss current Corporate Risks and the status allocated by Senior Executive Board (SEB).
2. To discuss other risks for possible inclusion on the Corporate Risk Register.

Recommendations

3. It is recommended that Audit and Standards Committee:
 - Notes and comments on the Corporate Risks shown in **Appendix A**.
 - Identifies any additional risks that it considers should form part of the Corporate Risk Register.
 - Identifies a risk for detailed scrutiny at the December 2021 meeting of this Committee.

Background

Risk Management Framework Update

4. Audit and Standards Committee in April approved a new corporate risk management framework. The Head of Audit Services has now attended all but one Directorate Management Team to talk through the changes to risk management procedures.

5. Also, for most directorates, Risk Workshops have been held. Following, the Workshop Audit Services staff will compile a list of directorate risks for agreement with the Directorate Management Team and assist in identifying:
 - The Inherent/Gross Rating.
 - The current mitigating actions that are in place and considered effective.
 - The Net/Residual Rating.
 - The Target Risk Rating.
 - What further Actions need to be taken to achieve the Net Rating.
6. A similar process will be undertaken for the Corporate Risks; the Head of Audit Services will meet with each of the Risk Owners to discuss their risk(s) and ensure they are articulated, rated and managed in accordance with the new Risk Management Framework.
7. The risk workshops that have been undertaken to date have identified that a substantial amount of work will need to be undertaken to raise the level of understanding of formal risk management and to embed an effective risk management framework. It is vital that the Council is clear on its objectives, and risks have been identified in relation to these objectives. This will take time given the limited capacity of all concerned (Internal Audit, Corporate Risk Owners and Directorate Management Teams).
8. The work undertaken with Corporate Risk Owners may identify risks that can be merged or where the risk is more appropriate to be monitored at directorate level.
9. Since the last report to SEB, further changes have been made to the Risk Management System (Spectrum) and this is now in a position to be rolled out across the Council. The System is simple to use but there are “help” boxes incorporated into the system that will provide assistance to the user.
10. Audit Services are also planning to produce risk management dashboards that will provide key information in a quick and user-friendly way.

Changes to Corporate Risks

11. Strategic Executive Board on 18th August 2021 made the following changes to the Corporate Risk Register:
 - The existing risk R.242 has been broadened to consider wider issues of Recruitment and Retention.

- An additional risk has been recognised in relation to Procurement and Contract Management.
- Risks R.343 and R.372, relating to the regeneration programme and funding, have been combined.

12. The following table shows changes to Corporate Risk Ratings proposed by SEB. These ratings are based upon the new Risk Management Framework that was approved by Audit and Standards Committee in April 2021. The table also shows the date when each risk was last reviewed in detail by Audit and Standards Committee. **Appendix A** provides a status update on each Corporate Risk.

Risk	Rating	Status
R.14 HR Policies Reviewed: 09/02/2017	Medium	No Change
R15 The Council Budget Reviewed: 26/7/2017	High	No Change
R.18 Information Governance Reviewed: 9/12/2014	High	No Change
R.20 Welfare Reform Reviewed: 21/04/2021	High	Decreased
R.21 Corporate Fraud Reviewed: 15/4/2015	High	No Change
R.137 Health and Safety Reviewed: 20/9/2021	High	Decreased
R.234 Emergency Planning Reviewed: 21/12/2017	Medium	No Change
R.242 Recruitment and Retention Not Reviewed	High	Change to risk description

R.286 Payroll Reviewed: 9/12/2019	High	No Change
R.287 Payment Card Industry (PCI) Compliance Reviewed: 21/9/2020	Medium	Decreased
R.306 UK failing to agree trade deals with EU, USA and Worldwide Reviewed: 15/4/2019	High	No Change
R.342 Vulnerable Adults Reviewed: 7/12/2020	High	Decreased
R.341 Vulnerable Children Reviewed: 23rd June 2021	High	Decreased
R.354 Risk of failure to meet the Regulator of Social Housing “Consumer Standard” Not Reviewed	High	No Change
R.365 Equality Act 2010 and Public Sector Equality Duty Not Reviewed	High	Decreased
R.366 Cyber Security Not Reviewed	High	No Change
R.367 Digital Platform Programme Not Reviewed	High	No Change
R.368 Ofsted and the Care Quality Commission requirements Not Reviewed	Medium	No Change

R.369 Covid-19 Not Reviewed	Medium	Decreased
R.370 Climate Change Not Reviewed	High	Decreased
R.371 Portersfield Development Not Reviewed	Medium	No Change
R.372 Regeneration Opportunities Not Reviewed	High	Decreased
R.YYY Procurement/Contract Management Not Reviewed	High	New Risk

Risk Reporting

13. Directors have followed good practice by identifying additional risks for possible inclusion on the Corporate Risk Register, prior to the quarterly meeting where risk is formally discussed. It is vitally important that this practice continues. Where urgency demands the addition of new risks to the Corporate Risk Register, the proposal should be discussed with the Head of Audit Services, and SEB approval should be sought.
14. Audit and Standards Committee at its meeting of the 23rd June 2021 selected risk R.137 “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” to be reviewed at its meeting on the 20th September 2021. The Committee are required to select another risk for review at the December meeting.

Finance

15. There are no direct financial implications arising from this report.

Law

16. The Accounts and Audit Regulations 2015 require each relevant authority to have a sound system of internal control which includes effective arrangements for the management of risk.

Risk Management

17. This report does not create any new risks. Although, new risks are put forward for consideration for inclusion on the Corporate Risk Register.

Equality Impact

18. This report does not raise any equality issues.
19. An effective risk management framework will help protect the interests of children and young people, albeit they were not consulted on, or involved, with the development of this report.

Human Resources/Organisational Development

20. This report does not have any human resources or organisational development implications.

Commercial/Procurement

21. There are no commercial/procurement considerations relating to this report.

Council Priorities

22. An effective risk management framework will help to ensure that Council priorities are met.



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Background Documents

Appendix A – Corporate Risks

APPENDIX A

Corporate Risk Register

Risk R.14	<u>HR Policies</u>	Owner	Previous Rating	Current Rating
	Legal Challenge to HR policies e.g. Holiday pay.	Jacqueline Branch	Medium	Medium
Mitigating Action(s)	1) Specialist legal advice and support.			
Status Update	Arrangements remain in place to review and update HR policies and introduce new ones particularly in response to the Covid pandemic, to ensure they are in line with Government Guidelines and LGA guidance, consistent with the approaches agreed by West Midlands Local Authorities and informed by recommendations from expert employment lawyers. Dudley Council continues to receive regular updates from the National Employers team within the LGA on emerging employment legislation and associated guidance which is acted on in a timely manner to mitigate legal challenges to our employment practices and policies.			

Risk R.15	<u>The Council Budget</u>	Owner	Previous Rating	Current Rating
	The Council may be unable to set and/or manage its budget so as to meet its statutory obligations within the resources available.	Iain Newman	High	High
Mitigating Action(s)	1)Financial intelligence 2)Monitoring and forecasting of council tax and business rates 3)Reports to Cabinet, Scrutiny, Audit & Standards and Council on budgets 4)Monitor financial stability of Better Care Fund			
Status Update	No Change.			

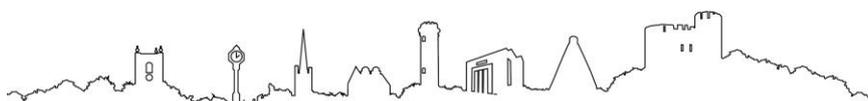
Risk R.18	<u>Information Governance</u>	Owner	Previous Rating	Current Rating
	The Council may fail to; assess the importance of information to the business and may be unaware of the potential impact on the organisation should the confidentiality, integrity or availability of information be compromised.	Iain Newman	High	High
Mitigating Action(s)	1)Maintain standards of Information Governance and Transparency through the Information Governance Board. 2)Corporate Information Governance Team 3)On line Data Protection Training 4)Escalation of Information Governance issues 5)Action plan for compliance			
Status Update	No Change.			

Risk R.20	<u>Welfare Reform</u>	Owner	Previous Rating	Current Rating
	There is a risk that various changes to welfare and benefits systems could place people at risk and increase pressures on statutory services.	Iain Newman	Extreme	High
Mitigating Action(s)	1)Corporate Welfare Reform Board in place to take a strategic approach. 2)Increased provision for bad debt (Housing Services). 3)Joint working with third sector and other partners to identify & support people affected by Welfare Reforms. 4)Review housing stock to balance supply and demand. 5)Council Tax Reduction (CTR) Scheme Review. 6)Strengthening Families Programme enables and assists families in meeting progress to work criteria Implementation of additional Council Tax reductions under the Hardship Fund. 7)Implementation of Covid Isolation Payments. 8)Implementation of Winter Support Grant and Emergency Assistance Grant.			
Status Update	Mitigating controls are operating. Changes to the administration of CTR have been successful and have helped to manage the economic impacts of the pandemic.			

Risk R.21	<u>Corporate Fraud</u>	Owner	Previous Rating	Current Rating
	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.	Iain Newman	High	High
Mitigating Action(s)	1)Anti-Fraud and Corruption Plan.			
Status Update	No Change.			

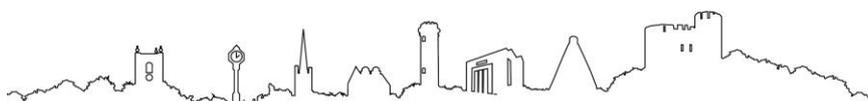
Risk R.137	<u>Health and Safety</u>	Owner	Previous Rating	Current Rating
	Failure to have in place effective arrangements for managing health and safety leading to risks to Council staff, service users and visitors to Council premises.	Iain Newman	Extreme	High
Mitigating Action(s)	1)Effective information, instruction and training. 2)Effective Planning & Implementation. 3)Effective Health & Safety organisation. 4)Effective monitoring & auditing. 5)Personal Protective Equipment PPE.			
Status Update	Mitigating controls are working effectively, including additional controls introduced in response to the pandemic. There has been no formal HSE intervention.			

Risk R.234	<u>Emergency Planning</u>	Owner	Previous Rating	Current Rating
	Failure to implement emergency planning and business continuity arrangements will increase the inability of the local authority to respond and recover from incidents.	Karen Wright	Medium	Medium
Mitigating Action(s)	1)Develop corporate protocol and support the implementation of emergency evacuation procedures across all Council operated premises. 2)Ensure elected members are equipped to carry out responsibilities for managing and recovering from civil emergencies. 3)Support the organisation's resilience in meeting its business continuity management obligations. 4)Co-ordinate and manage the Council's response to COVID-19 to ensure that it meets its statutory responsibilities.			
Status Update	No Change			



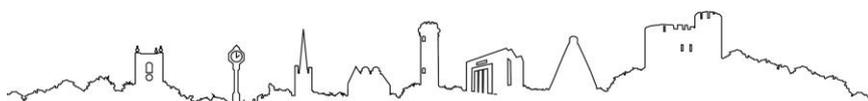
Risk R.242	<u>Recruitment and Retention</u>	Owner	Previous Rating	Current Rating
	There is a risk that the Council's capacity to support delivery of its priorities or take advantage of emerging opportunities may become insufficient due to the inability to recruit and retain staff particularly in professional areas where there is a national shortage of skills and expertise. This is due to market supply difficulties as a result of a shortage of skills nationally and potential employees choosing other Local government employers over Dudley due to perceptions about Dudley's employment offer and the Council not being a desirable place to work. This will lead to services supporting vulnerable people failing to meet statutory requirements, a loss of potential regeneration investment into the borough, increases in workforce stress, customer dissatisfaction and diminishing political support.	Jacqueline Branch	N/A	High
Mitigating Action(s)	1) Delivery of the key actions within the 5 priorities within the People Strategy.			
Status Update	Risk description has been updated and rating changed.			

Risk R.286	<u>Payroll</u>	Owner	Previous Rating	Current Rating
	Failure to address the payroll actions in the internal audit report may result in staff not being paid correctly	Jacqueline Branch	High	High
Mitigating Action(s)	1)Where required CHAPS payments will be made. 2)Payroll, ICT and Finance working closely to identify root causes of problems.			
Status Update	Steady progress continues to be made to implement the actions identified in the internal audit report. HR, Finance and ICT continue to work closely to identify and address any emerging issues and the establishment of a Pay Governance group to deal with pay policy issues at an organisational level has further strengthened governance around these matters.			



Risk R.287	<u>Payment Card Industry (PCI) Compliance</u>	Owner	Previous Rating	Current Rating
	If the Council is unable to stay Payment Card Industry Compliant (P.C.I), several risks may arise/be incurred: financial penalties, reputational damage and the Council's approach to income collection impeded.	Iain Newman	High	Medium
Mitigating Action(s)	1) Specialist security consultants commissioned to conduct a review and provide report. 2) Icon Programme Board to review all payment methods and revisit preferred methods of taking payments.			
Status Update	By splitting the submission into several separate Self-Assessment Questionnaires (SAQ), this significantly mitigated the risk of non-compliance. Recently Semafone has been installed which has mitigated telephone payments. The only area outstanding is Chip-and-PIN with point-to-point encryption (P2PE) for cardholder-present payments. However, alternatives have been explored and it is intended to remove Chip and PIN option. It is expected that the PCI standard will be refreshed for 2022 so specialist advice will be needed to complete the new Self Assessment Questionnaires (SAQs). However, we will be in a position to submit this year's SAQs unsupported.			

Risk R.306	<u>UK failing to agree trade deals with EU, USA and Worldwide</u>	Owner	Previous Rating	Current Rating
	Following the UK's exit from the European Union, risks remain in respect securing satisfactory international trading arrangements and agreements with the constituent states of the EU, the USA and other countries World wide.	Kevin O'Keefe	High	High
Mitigating Action(s)	1) Ongoing monitoring of the situation and appropriate advice and guidance provided to businesses.			
Status Update	No additional actions required at present. Whilst the longer term impact of Brexit is still unknown ongoing support is still being provided to local businesses through Dudley Business First.			



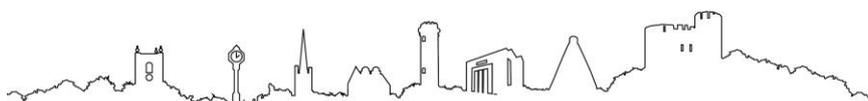
Risk R.342	<u>Vulnerable Adults</u>	Owner	Previous Rating	Current Rating
	Risk of failure to protect adults in positions of vulnerability due to increasing demand, changing patterns of abuse (e.g. exploitation) and reducing resources.	Matt Bowsher	Extreme	High
Mitigating Action(s)	<p>1)Current referral pathway for MASH is multi agency and Care Act Compliant.</p> <p>2)Strategic safeguarding training and social media strategy established. Conversations with stakeholders are taking place and training opportunities have been identified.</p> <p>3)The Dudley peoples safeguarding partnership have identified their 4 key priorities these include, protecting vulnerable adults from financial abuse, protecting vulnerable adults from violence and the identified LPS</p> <p>4)Work with Trading Standards continues to protect vulnerable adults and is receiving national interest.</p>			
Status Update	Dudley MBC maintained a full safeguarding adults offer throughout the pandemic and has also been able to triage and complete Deprivation of Liberty Safeguards in a timely fashion with very low outstanding cases. The rating has been downgraded to High accordingly.			

Risk R.341	<u>Vulnerable Children</u>	Owner	Previous Rating	Current Rating
	Risk of failure to protect children in positions of vulnerability, due to increasing demand, changing patterns of abuse (e.g. exploitation) and reducing resources.	Catherine Driscoll	Extreme	High
Mitigating Action(s)	<p>1)Performance is scrutinised through the Children's Service Improvement Board, the Department for Education (DfE) and Ofsted on a regular basis.</p> <p>2)Dudley MBC with partners has launched an Exploitation Hub in June 2021 (known as DEx) to improve the partnership response to children and young people at risk of criminal exploitation.</p> <p>3)Workforce Board led by the DCS has been established to increase recruitment and retention activity to build capacity to work with children and families to support and protect.</p>			
Status Update	<p>Performance indicators have shown improvement as a result of the comprehensive improvement plan, particularly in relation to timeliness at the Multi Agency Safeguarding Hub (MASH) which means that risk is assessed in a timely way.</p> <p>Improvement and grip has been recognised by the DfE to support the reduction of risk rating. However, this risk remains High given the scale of the challenges facing the service, the scarcity of staff and the as yet unknown impact on children and young people of the pandemic.</p>			

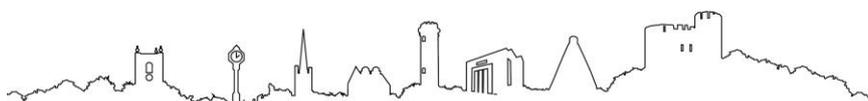
Risk R.354	<u>Risk of failure to meet the Regulator of Social Housing "Consumer Standard"</u>	Owner	Previous Rating	Current Rating
	Risk of failure to meet the Regulator of Social Housing "Consumer Standard".	Paul Davies	High	High
Mitigating Action(s)	1)Compliance Health check has informed actions to address structural, process and operational issues.			
Status Update	No Change.			

NB/ Update provided by the Deputy Chief Executive

Risk R.365	<u>Equality Act 2010 and Public Sector Equality Duty</u> Failure to adhere to the Equality Act 2010 and Public Sector Equality Duty could result in reputational and legal consequences which could impact on recruitment and retention.	Owner Kevin O’Keefe	Previous Rating Extreme	Current Rating High
Mitigating Action(s)	1) Establish a Strategic Equality and Inclusion Leadership Group. 2) Develop a new 3-year Equality and Inclusion Strategy and Action Plan (which is outcome focused). 3) Performance manage the 17 recommendations from the independent review. 4) The Chief Executive and delegated Cabinet Member have responsibility and champion Equality and Inclusion. 5) Identify resources to support the Council to meet its legal equality duties.			
Status Update	The rating has been reduced from Extreme to High as the Corporate Equality group has now been established and a work programme developed. Both the Equality, Diversity and Inclusion Manager and Support Officer Posts have been appointed to and both post holders will be commencing employment soon to lead on delivering all the actions in the work programme.			



Risk R.366	<u>Cyber Security</u>	Owner	Previous Rating	Current Rating
	Failure to adopt the good practice recommended by the National Cyber Security Centre could mean our networks and systems are unsecure and are open to attack resulting in possible data breach and loss of systems/facilities.	Luisa Fulci	High	High
Mitigating Action(s)	<p>1)An assessment against the good practice issued by the National Cyber Security Centre has been undertaken and an action plan is in place to address anything outstanding.</p> <p>2)Any national or local cyber events are evaluated and any learning identified.</p> <p>3)An Information Security Standards Board has been established to monitor the security of the Council's infrastructure and systems.</p> <p>4)A process is in place to deal quickly with any cyber events that do arise, which includes contingency arrangements.</p>			
Status Update	Cyber Essentials accreditation has been obtained. The Council are also actively working with MHCLG on a Cyber Treatment Plan to improve our technical defences.			

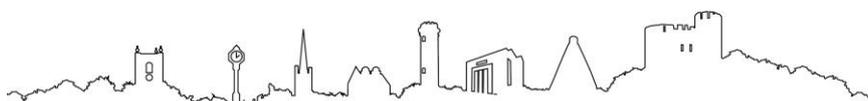


Risk R.367	<u>Digital Platform Programme</u>	Owner	Previous Rating	Current Rating
	Failure to clarify objectives and resource requirements appropriately will result in the digital platform programme not delivering efficient services and a better experience for customers.	Luisa Fulci	High	High
Mitigating Action(s)	<p>1) Objectives of the digital platform programme will be determined and a clear commitment made by the Council to support the programme.</p> <p>2) Resources will be identified to deliver the objectives of the programme.</p> <p>3) A methodology will be agreed to prioritise developments to the portal.</p> <p>4) Business change staff will be employed to ensure processes are as efficient and effective as possible.</p>			
Status Update	<p>a) Initiated a programme of work aimed at producing a business case for developing fit for purpose:</p> <ul style="list-style-type: none"> a. portal for customers to self-service and associated forms b. portal for councillors to raise issue c. customer service CRM. A system that captures customer details, manages a service request and retains details of the service request. Not a system that provides a single customer view. This will be a separate case. d. booking system e. reporting module <p>b) The programme of work includes:</p> <ul style="list-style-type: none"> a. requirements capture b. scoping suppliers that could deliver the requirements c. cost and benefit quantification d. documenting a high level transition plan and how we can make the most of what we already have e. producing the business case <p>The plan is to present the business case to SEB end September 2021</p>			

Risk R.368	<u>Ofsted and the Care Quality Commission requirements</u> The lack of effective governance may mean that the issues raised by Ofsted and the Care Quality Commission in their local area inspection report issued in July 2019 are not implemented resulting in the needs of young people with SEND not being properly assessed and addressed.	Owner	Previous Rating	Current Rating
		Catherine Driscoll	Medium	Medium
Mitigating Action(s)	1) Formal programme management has been established to address the Written Statement of Action including regular monitoring by the SEND Oversight Group. 2) Governance meetings are regularly attended by DfE and NHSE to monitor and feedback on progress.			
Status Update	No additional actions required.			

Risk R.369	<u>Covid-19</u> Failure to effectively implement the Local Outbreak Management plan will result in a rising infection rate, greater economic distress and increased deaths.	Owner	Previous Rating	Current Rating
		Karen Wright	Extreme	Medium
Mitigating Action(s)	1) The Local Outbreak Management Plan is in place and will be reviewed and updated in line with changes in the national Contain Framework.			
Status Update	Vaccination uptake in the borough continues to improve - ensuring that more of the population is protected from becoming seriously ill or dying from covid 19. It also prevents covid-19 spreading to others .			

Risk R.370	<u>Climate Change</u>	Owner	Previous Rating	Current Rating
	Failure to embed carbon reduction in all aspects of the Council's operation will result in the inability to achieve the carbon neutral aspiration by 2041.	Balvinder Heran	Extreme	High
Mitigating Action(s)	1)Climate Change formal Programme Management established with defined plans and regular reporting. 2) A bid is to be made to Cabinet for additional resources to drive Dudley's response.			
Status Update	The aim is to provide a DMBC masterplan for carbon neutral linked to the WMCA key themes. Discussions taken place with WMCA to provide resource to support the development of the masterplan. The identified additional resource is a critical element that is required to support Climate Change as a key priority.			



Risk R.371	<u>Portersfield Development</u>	Owner	Previous Rating	Current Rating
	Portersfield Development is an ambitious project that has potential to kickstart regeneration of Dudley Town Centre and add value to the local economy but, at the same time, carries financial, commercial, planning, procurement and other compliance risk that will need to be carefully managed.	Kevin O'Keefe	Medium	Medium
Mitigating Action(s)	<p>1)Independent due diligence on Financial elements undertaken.</p> <p>2)Independent due diligence on Development elements.</p> <p>3)Ensure the independence of the LPA is retained by use of planning agent to ensure probity.</p> <p>4)Phasing of scheme so that each element (student accommodation, residential and ice rink) is only brought forward as an end user is contracted.</p> <p>5)Ensure the delivery of a high quality well designed scheme to increase the attractiveness of the residential offer and provide longevity of the offer.</p> <p>6)External legal advice is being sought to address the procurement aspects of the development.</p>			
Status Update	<p>The independent due diligence undertaken indicated a level of risk that was unacceptable to the council. Therefore, as of end of June 2021 the Council made the decision to end the partnership with Avenbury and to go out to the market for a partner.</p> <p>A Prior Information Notice (PIN) is being developed and a design competition will be held.</p> <p>Whilst this has reduced the level of risk in many regards, until a development partner is identified and the development mix is fixed financial, commercial, planning, procurement and other compliance risks cannot be fully quantified.</p>			

Risk R.372	<u>Regeneration Opportunities</u>	Owner	Previous Rating	Current Rating
	Failure to seize the opportunities and exploit the benefits that will come from the huge regeneration programme investment due to a lack of a strategic approach and insufficient resources could result in unfulfilled economic prosperity and social benefits.	Helen Martin	Extreme	High
Mitigating Action(s)	<p>1)Creation of a clear regeneration statement/plan on a page on the vision for the borough, linked to the Council Plan and local plan to show that activity is aligned.</p> <p>2)Robust governance process, with regular reporting via SEB, Major Capital Investment Board on regeneration opportunities and progress on projects.</p> <p>3)Member and key stakeholder involvement in decisions to bid and bid submission. Use of scrutiny process to ensure Member oversight.</p> <p>4)Ensuring adequate resourcing, and where capacity is insufficient use of interims and consultants (i.e. bid writing and project management).</p>			
Status Update	<p>We need to produce a regeneration and an economic strategy that has a clear vision and direction so that we can prioritise resources and activity towards these key drivers, and therefore by implication not pursue activities and bids that do not further these aspirations. It may mean less but more impactful projects rather than a scatter gun approach. Also, a need to balance the competing demands of the larger projects and the local ward member priorities.</p> <p>The more regeneration we deliver successfully greater the demand from local communities and members will want us – there is a need to level up across all areas - so a need to ensure we deliver at both scales.</p> <p>There are a number of funding streams being announcement by the government and we have been successful in many bids. But the quantum of funds is expected to be less than was available via EU funds, some are direct to LA and some are via WMCA so the level of control and influence is reduced. Capacity of the team remains a critical issue as there are many live bids (Towns Fund, Brierley Hill Future High Streets Fund, and 4 x Levelling Up Fund Bids plus a number of master planning exercise such as Lye). There is a skill shortage and the ability to recruit is limited in this market. We buy in skills and capacity where we can but this takes time and money and still requires an input from the team. A real need for project and programme managers.</p>			

	<p>What else can we do:</p> <ul style="list-style-type: none"> • Continue to seek further resources and capacity as well as outsourcing where we can capitalise the costs against projects. • Engage specialised bid writers and additional project managers. • Upskilling team to provide key elements.
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Risk R.YYY	<u>Procurement/Contract Management</u>	Owner	Previous Rating	Current Rating
	Non-compliance with Contract Standing Orders/Procurement legislation and ineffective contract management due to a lack of procedures, training and quality framework could result in value for money not being obtained, contracts set aside and statutory obligations not being met).	Luisa Fulci	N/A	High
Mitigating Action(s)	1)A central Procurement Team that can offer advice and guidance 2)Guidance documents to be produced 3)Training to be delivered to all appropriate officers.			
Status Update	New Risk			

