
Audit and Standards Committee – 7th December 2020

Report of the Director of Finance and Legal

Risk Management

Purpose

1. To discuss current Corporate Risks with Audit and Standards Committee.

Recommendations

2. 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 April 2021 meeting of this Committee.

Background

Risk Management Responsibility and Framework

3. Audit Services undertook a review of Corporate Risk Management as part of the 2019/20 Audit Plan. The final audit report provided “Limited” assurance on the Council’s risk management framework. Following the issue of the report the Head of Audit Services was requested to take a report on risk management to Strategic Executive Board (SEB) on the 19th August 2020 and they made a decision to transfer responsibility for risk management from Financial Services to Audit Services. The justification for the decision was that there was insufficient capacity within Financial Services to address the Actions in the internal audit report and by transferring to Audit Services there would be synergies in combining risk and assurance work. Also, it is recognised that most Heads of Audit in Local Government are responsible for risk management.

4. Following the attendance at SEB the Head of Audit Services has been speaking to ICT Services to establish what changes can be made to the risk management system (Spectrum) to address the Actions in the internal audit report. I am pleased to report that ICT Services have confirmed that most of the requirements can be completed by the 31st March 2021. It is therefore planned for the current Risk Management Strategy to be updated, discussed with SEB in March 2021 and brought to Audit and Standards Committee in April 2021 for approval. Following approval by Audit and Standards Committee, the new system and processes will be rolled out across the Council, however acknowledging that during the first quarter support will need to be provided to directorates/Managers.

Changes to the Corporate Risk Register

5. Strategic Executive Board decided at its meeting of the 18th November 2020 to recognise some other areas on its Corporate Risk Register. See below:

Risk	Rationale
Cyber Security	This is recognised by annual surveys to be a key risk for all organisations. Although, there is a generic risk in relation to information, this does not capture the importance of this risk and the relevant mitigating actions.
Climate Change	The Council has recently declared a Climate and Environment Emergency and is establishing processes. Many similar Councils have identified this risk on their Corporate Risk Registers.
SEND	Ofsted and Care Quality Commission identified some significant weaknesses in their inspection report of July 2019 and there is also a material budget issue to be addressed. This issue was also highlighted in the Annual Governance Statement for 2019-20.
Covid-19	At the time of reporting to SEB, Dudley Borough had one of the highest infection rates in the country. There is already a Covid-19 operational risk register in place and the existing Corporate Risks have been reviewed and, in many cases re-rated to take account of the Covid-19 pandemic. This will be kept under review.

6. In addition to the areas listed under paragraph 5, SEB have suggested that the risk in respect of Major ICT Projects should be broken down into a number of

specific risks relating to individual projects so as to better reflect their different stages of development. The Head of Audit Services will liaise with the nominated Risk Owners and further detail will be included in the Corporate Risk Register appended to the report to Audit and Standards Committee in April.

Scrutiny of Corporate Risks

7. Audit and Standards Committee at its meeting of the 12th August 2021 selected risk R.342 “Vulnerable Adults” to be reviewed at its meeting on the 7th December 2020. The Director of Adult Social Care will present on the evening.
8. Audit and Standards Committee are invited to select another risk for scrutiny at its April 2021 meeting. Appendix A lists out the date when individual corporate risks were last scrutinised by Audit and Standards Committee and the table under paragraph 5 lists risks that have been identified for future inclusion.

Finance

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

Law

10. 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.

Equality Impact

11. This report does not raise any equality issues.
12. An effective risk management framework will help protect the interests of children and young people.

Human Resources/Organisational Development

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

Commercial/Procurement

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

Health, Wellbeing and Safety

15. There is no direct impact on the health, wellbeing and safety of the Borough's citizens.



Iain Newman

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Background Documents

Corporate Risk Management Audit Report



Appendix A

R = Risks A = Actions	01/04/2020 to 30/06/2020	01/07/2020 to 30/09/2020
R.14 HR Policies <i>Owner: Jacqueline Branch</i> Legal Challenge to HR policies e.g. Holiday pay Reviewed: 09/02/2017	MODERATE (8)	MODERATE (8)
	Reviewed by SEB 21/04/2020 - no changes made.	SEB agreed at its meeting of the 18th November 2020 to retain this rating
A.863 Specialist legal advice and support. <i>Owner: Iain Newman</i>	Annual review of equal pay claims and holiday pay claims scheduled for 15th September 2020.	Annual review of equal pay and holiday claims took place as scheduled, 15th September 2020
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. Reviewed: 26/7/2017	MAJOR (20)	MAJOR (20)
	The Covid 19 situation leads to additional costs, including those of sustaining Adult Social Care, providing additional protection to staff and managing excess mortality. It also impacts adversely on income, including potential long-term impacts on Council Tax and Business Rates as a result of economic decline. These impacts are likely to exceed the additional government grant so far made available. SEB update 21/04/2020	SEB agreed at its meeting of the 18th November 2020 to retain this rating
A.864 Financial intelligence <i>Owner: Rachel Cooper</i>	Attendance at WMCA working groups and access to Sigoma	(Virtual) Attendance at SIGOMA and WMCA workshops
A.866 Monitoring and forecasting of council tax and business rates <i>Owner: Sean Beckett</i>	Monthly monitoring and reporting is taking place. Covid is having a negative effect on the ability to pay and a limiting effect on our ability to take recovery action.	Monthly monitoring and reporting is taking place. Covid is having a negative effect on the ability to pay and a limiting effect on our ability to take recovery action.
A.869 Reports to Cabinet, Scrutiny, Audit & Standards and Council on budgets <i>Owner: Iain Newman</i>	Revenue Budget Strategy went to Cabinet 12 February 2020 and Council 2nd March 2020 Revenue Outturn and MTFS went to Cabinet 6th July 2020 Statement of Accounts scheduled and VFM Assessment scheduled for	Statement of Accounts/VFM presented to Audit and Standards Committee 21st September 2020. Budget/Revenue report going to Cabinet 29th October 2020. Cabinet Summit scheduled for November

	September 2020 Audit & Standards Committee	2020. MTFS scheduled for December 2020 Cabinet.
A.3181 Monitor financial stability of Better Care Fund <i>Owner: Matt Bowsher</i>	The Better Care Fund objectives continued to be met throughout the peak of the first Covid '19 wave. This freed up essential critical care beds in order for Covid '19 positive patients to be treated. The funding was spent in line with spending forecasts and on budget.	The Better Care Fund objectives continued to be met following the first Covid '19 wave. The funding was spent in line with spending forecasts and on budget and work has commenced to secure the requisite level of investment for 21/22
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. Reviewed: 9/12/2014	SIGNIFICANT (12) There may be a need to utilise information held such as Electoral Register for assistance with things like Safeguarding e.g. food Parcels. Working from home may also increase information governance risks. SEB update 21/04/2020	SIGNIFICANT (12) SEB agreed at its meeting of the 18th November 2020 to retain this rating
A.907 Maintain standards of Information Governance and Transparency through the Information Governance Board <i>Owner: Lewis Bourne</i>	New Policies for CCTV and guidance for Information Asset Owners recently approved by IG Board.	All Corporate IG and ICT policies updated and re-published via Learning/Policy Platform in line with latest guidance and legislation.
A.908 Corporate Information Governance Team <i>Owner: Iain Newman</i>	Recruitment and selection process fully completed - full complement of staff now in place for Corporate Information Governance Team	IG Team continues to maintain a full complement of staff successfully working from home.
A.909 On line Data Protection <i>Owner: Lewis Bourne</i>	Current analysis of course completion suggests an average of 61% of staff have completed all Cyber Security and Information Governance eLearning modules. Report to SEB pending that will recommend reinforcement of the requirement.	Report presented to SEB and all Information Asset Owners/Managers advised to ensure staff undertake mandatory courses.
A.910 Escalation of Information Governance issues <i>Owner: Iain Newman</i>	Control reviewed and still valid - issues escalated as appropriate.	Where appropriate IG issues escalated to SIRO. 2 cases of civil claims for data breach compensation

		now also requiring involvement from Legal Services.
A.911 Action plan for compliance <i>Owner: Lewis Bourne</i>	Mechanisms for delivering service virtually being developed and full complement of staff now in place.	Virtual Data Protection Audits via MS Teams and MS Forms being trialled with Schools as part of our Traded Service offering.
R.20 Welfare Reform <i>Owner: Iain Newman</i> There is a risk that various changes to welfare and benefits systems could place people at risk and increase pressures on statutory services. Reviewed: 28/6/2016	MAJOR (20) Longer term impact to peoples' lives . SEB update 21/04/2020	MAJOR (20) SEB agreed at its meeting of the 18th November 2020 to retain this rating.
A.752 Corporate Welfare Reform Board in place to take a strategic approach <i>Owner: Sean Beckett</i>	A corporate welfare reform board took place 05.06.2020 the next one is scheduled for 03.08.2020	A corporate welfare reform board took place 22.09.2020 the next one is scheduled for 08.10.2020
A.753 Increased provision for bad debt (Housing Services) - Corporate risk action <i>Owner: Catherine Ludwig</i>	2020/21 bad debt provision was set prior to Covid 19 crisis so we are now forecasting an increased requirement for bad debt provision. We hope that we will be proved pessimistic. We have reviewed budgetary provision and because we were able to carry forward a higher balance forward from 2019/20 we can accommodate the increase in projected bad debt provision within the current budgetary envelope. We do not set revised budgets but this will be reflected within the forecasts regularly presented to Cabinet.	2020/21 bad debt provision was set prior to Covid 19 crisis so we are now forecasting an increased requirement for bad debt provision. We hope that we will be proved pessimistic. We have reviewed budgetary provision and because we were able to carry forward a higher balance forward from 2019/20 we can accommodate the increase in projected bad debt provision within the current budgetary envelope. We do not set revised budgets but this will be reflected within the forecasts regularly presented to Cabinet.
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>	Covid 19 has affected the operations of our partners particularly in the third sector. However, we have maintained links as far as possible and have offered help and support to tenants. The Corporate Welfare Reform Group has continued to meet virtually and maintain service	Covid 19 continues to affect the operations of our partners particularly in the third sector. However, we have maintained links as far as possible and have offered help and support to tenants. The Corporate Welfare Reform Group has continued to meet virtually and maintain service links.

	links, and work on the Anti Poverty Strategy is now recommencing.	
A.755 Review housing stock to balance supply and demand - Corporate risk action <i>Owner: Catherine Ludwig</i>	Ongoing - progress continues albeit slowed by Covid 19	Ongoing
A.2839 Council Tax Reduction Scheme Review <i>Owner: Sean Beckett</i>	No action on this during this financial year.	No action on this during this financial year.
A.3199 Strengthening Families Programme enables and assists families in meeting progress to work criteria <i>Owner: Helen Ellis</i>		Dudley MBC continues to work closely with colleagues from DWP who form part of the governance structure both in the Strengthening Families sub-group and higher level Early Help Steering Group. Detailed information has been available around the impact of welfare reform on the programme throughout this period. Most recently and significantly, the DWP resource has been impacted upon as the support staff were removed from the programme to support the surge in Universal Credit applications as COVID-19 commenced. The resource returned in August 2020. However, the programme is predicated through its Payment By Results programme on 'progress to work' and 'significant and sustained progress'. These remain a challenge and like many other local authorities in the region and nationally, Dudley has not been able to maintain our targets to fully claim the Payment By Results element of the grant fully at this stage due to family's needs being impacted upon through the pandemic. Given the pandemic, nationally, representation has been made to relax the Payment By Results element from the Ministry of Housing, Communities and Local

		Government. There has been no shift in this position. The funding for 2021/22 is also yet to be determined with a decision likely from the Ministry of Housing, Communities and Local Government in December 2020 for a further one year allocation. Early messages are that there may be a shift in part or fully to population based payment by results, rather than or in addition to individual and family progress.
A.3357 Implementation of additional Council Tax reductions under the Hardship Fund <i>Owner: Sean Beckett</i>	Circa £2.5M has been awarded to date.	Circa £2.5M has been awarded to date.
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. Reviewed: 15/4/2015	SIGNIFICANT (12)	SIGNIFICANT (12)
	In light of Business rate grants, procurement (demand for PPE) and reliefs (being passed down to employees / contractors). SEB update 21/04/2020	SEB agreed at its meeting of the 18th November 2020 to retain this rating.
A.1572 Anti-Fraud and Corruption Plan <i>Owner: Graham Harrison</i>	Work on the Fraud Plan has been postponed due to Covid-19. Work will recommence in July 2020.	Fraud work has been impacted during this period by further work being undertaken on business grants. However, since September good progress is starting to be made against the Fraud Action Plan.
R.137 Health & Safety <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 Reviewed: 5/2/2018	MAJOR (20)	MAJOR (20)
	Many staff redeployed across the Authority and therefore carrying out tasks that they are not familiar with. Risks associated with PPE and evolving govt guidance. SEB update 21/04/2020	SEB agreed at its meeting of the 18th November 2020 to retain this rating.

<p>A.1593 Effective information, instruction and training <i>Owner: Simon Reece</i></p>	<p>Health & safety management training programme in place. Steady demand for Managing Safely course – now delivered in two formats to maximise uptake of managers. Current co-vid 19 situation has caused postponement of some scheduled courses in Q4. These will be re-scheduled once current restrictions are lifted.</p>	<p>Health & safety management training programme in place. Demand for Managing Safely course – now delivered in two formats to maximise uptake of managers – has been affected by the Covid-19 pandemic. This has caused postponement of scheduled courses. These will be re-scheduled once current restrictions are lifted.</p>
<p>A.1594 Effective Planning & Implementation <i>Owner: Simon Reece</i></p>	<p>Directorate level action plans are on agendas of appropriate management team meetings. Development & progress is reported at quarterly management group meetings. Quarterly H&S Reports being compiled and sent to Management group attendees despite absence of physical meetings.</p>	<p>Directorate level action plans are on agendas of appropriate management team meetings. Development & progress is reported at quarterly management group meetings. Quarterly H&S Reports being compiled and sent to Management group attendees despite absence of physical meetings. Health & Safety input at a corporate level into the Recovery Task & Finish Group and the Covid-19 Incident Co-ordination Group has continued during the pandemic.</p>
<p>A.1595 Effective Health & Safety organisation <i>Owner: Simon Reece</i></p>	<p>Governance structure for health & safety adjusted to reflect senior management restructure. This has been included in revised corporate health & safety policy (March 2020).</p>	<p>Governance structure for health & safety adjusted to reflect senior management restructure. This has been included in revised corporate health & safety policy (March 2020). Membership of Corporate H&S Group is being revised to ensure it is representative of the current management structure.</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. Link to EWS to record violent incidents is now featured on system. EWS User Group established to review improvements to both system and officer usage. Health & Safety Compliance Review programme is in place. Current Covid-19 situation has led to temporary</p>	<p>Quarterly monitoring of health & safety performance is included in quarterly health & safety reports produced for management teams by CHST. Link to EWS to record violent incidents is now featured on system. EWS User Group established to review improvements to both system and officer usage. Health & Safety Compliance Review programme is in place, however current Covid-19 situation has led to temporary suspension of</p>

	suspension of new reviews, although existing reports are being written & issued. Reports & action plans are delivered to Divisional management teams (or school management teams) for action.	new reviews although existing reports are being written & issued. Reports & action plans are delivered to Divisional management teams (or school management teams) for action. CHST have focused on carrying out programme of assurance audits of covid-19 arrangements to ensure workplaces are 'Covid Secure'.
A.3355 Personal Protective Equipment PPE <i>Owner: Simon Reece</i>	We have a system within the Corporate H&S Team (CHST) whereby requests for stocking PPE (related to Covid-19 use) by Corporate Procurement and Procurement Managers are checked against relevant standards and certification requirements. Procurement are then advised as to whether to proceed with the purchase, request further details/clarification from the prospective supplier, or not to proceed with the intended purchase because it does not meet relevant standards or certification requirements for its intended use. Requests from sections for the supply of PPE from stocks are now also screened by CHST to ensure that they are appropriate for the intended use.	We have a system within the Corporate H&S Team (CHST) whereby requests for stocking PPE (related to Covid-19 use) by Corporate Procurement and Procurement Managers are checked against relevant standards and certification requirements. Procurement are then advised as to whether to proceed with the purchase, request further details/clarification from the prospective supplier, or not to proceed with the intended purchase because it does not meet relevant standards or certification requirements for its intended use.
R.234 Emergency Planning <i>Owner: Bal Kaur</i> Failure to implement emergency planning and business continuity arrangements will increase the inability of the local authority to respond and recover from incidents. Reviewed: 21/12/2017	MAJOR (20) Reviewed by SEB 21/04/2020. All Corporate Risks reviewed in context of COVID 19 and updated accordingly. Emergency Planning/Business Continuity Plans is/are in operation.	MAJOR (20) SEB agreed at its meeting of the 18th November 2020 to retain this rating.

<p>A.2033 Develop corporate protocol and support the implementation of emergency evacuation procedures across all Council operated premises <i>Owner: Simon Reece</i></p>	<p>Standard emergency evacuation procedures in place across Council premises. Procedures for dealing with bomb & terrorist threats have been developed with colleagues from CLS, ICT & DCM. Work on roll out of training on new procedures has been affected by Covid-19 Further progress on this will resume when Covid-19 restrictions allow.</p>	<p>Standard emergency evacuation procedures in place across Council premises. Procedures for dealing with bomb & terrorist threats have been developed with colleagues from CLS, ICT & DCM. Work on roll out of training on new procedures has been affected by Covid-19 Further progress on this will resume when Covid-19 restrictions allow.</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>Although there has been considerable pressure due to Covid pandemic we have managed to make some progress in this area. To ensure whatever we do is in consultation with elected members, we took proposals to Health Scrutiny Committee in September and gained approval for a road map to improving support and advice to elected members including on line resources and training.</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>Business Continuity Plans are now due for review however, to ensure all the learning from Covid is captured and taken forward some plans may benefit from a delay. However, the new quality assurance process approved by SEB has been cascaded via Heads of Service so the process of improved oversight and quality of Business Continuity Plans can be rolled out. The role of the Covid-19 Incident Management Group chaired by the DPH is currently acting as the group providing oversight to this process.</p>
<p>A.3256 Co-ordinate and manage the Council's response to COVID-19 to ensure that it meets its statutory responsibilities <i>Owner: Barry Jones/Sarah Hill</i></p>		<p>The local authority's response to Covid-19 is via the Covid-19 Incident Management Group and the multi-agency Dudley IMT/Health Protection Board. The overarching response as an organisation is via the 8 point plan which is updated and reported to SEB and the Covid</p>

		Engagement Board via these groups. In addition, oversight of the Dudley response is via Dudley Council Health Scrutiny Committee.
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 dissatisfaction and diminishing political support. Reviewed: N/A	SIGNIFICANT (12)	SIGNIFICANT (12)
	Arrangements put in place to support team resilience. SEB update 21/04/2020	SEB agreed at its meeting of the 18th November 2020 to retain this rating.
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>		Workforce plans are currently in place which align with Chief Officer plans and focused on key priorities that have workforce implications. Additional work was undertaken this year to review all directorate workforce plans so that common priority areas could be identified, and HR/OD resources allocated to address these. One of the priorities identified being hard to fill “professional” posts in a range of services across the organisation, resulting in work to strengthen succession planning, attract new talent at entry and graduate levels as well as attracting experienced professionals. Alongside, ongoing work to “grow our own” via investment in development through the Council’s apprenticeship Levy.

<p>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: Matt Williams</i></p>		<p>Continue to use interim capacity when absolutely necessary. Often in parallel with recruitment processes where demand remains critical.</p>
<p>R.243 Major ICT Projects <i>Owner: Rose Younger</i> 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. Social Care Replacement, Digital Platform and PIMS. Reviewed: 25/7/2018</p>	<p>SIGNIFICANT (12) ICT projects able to progress effectively via remote working. SEB update 21/04/2020</p>	<p>SIGNIFICANT (12) SEB agreed at its meeting of the 18th November 2020 to retain this rating.</p>
<p>A.2087 Each ICT programme is supported by a business case, project plan, risk and issues register, and performance is managed against these. Risks are continually monitored and corrective action taken if any develop into issues <i>Owner: Andrew Tromans</i></p>		<p>Documents and governance structures in place and operating. Documents prepared to evidence ICT readiness to support Liquid Logic and ContrOCC applications. LAS (Adults) phase of project went live on schedule 7th September. LCS (Childrens) phase on target for go-live 16th November.</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: Andrew Tromans</i></p>		<p>Successor project - Both Adults and Children's Services have now gone live</p>

<p>R.286 Payroll <i>Owner: Rose Younger</i> Failure to address the actions in the internal audit report may result in staff not being paid or not being paid correctly</p> <p>Reviewed: 9/12/2019</p>	<p>MAJOR (20)</p> <p>Reviewed by SEB 21/04/2020. No changes made. Working from home procedures in place.</p>	<p>SIGNIFICANT (12)</p> <p>A recent Internal Audit Report found some significant improvement in how the service was being delivered. SEB agreed at its meeting of the 18th November 2020 to down grade the rating to Significant.</p>
<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>	<p>Current Process still stands</p>	<p>Current process still stands</p>
<p>A.3169 Payroll, ICT and Finance working closely to identify root causes of problems <i>Owner: Jayne Catley</i></p>	<p>Continuing</p>	<p>Continuing</p>
<p>R.287 Payment Card Industry (PCI) Compliance <i>Owner: Iain Newman</i> 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.</p> <p>Reviewed: 21/9/2020</p>	<p>MAJOR (16)</p> <p>Reviewed by SEB 21/04/2020. No changes made to rating. Increased options for residents to pay online</p>	<p>SIGNIFICANT (12)</p> <p>SEB at its meeting of the 18th November 2020 agreed to lower the rating as the Council is now certified compliant in four of the six areas.</p>
<p>A.2561 Specialist security consultants commissioned to conduct a review and provide report <i>Owner: Andrew Tromans</i></p>	<p>Submission made for four payment channels. Work continuing on other channels, notably Semafone for mediated telephone payments and point-to-point encryption (P2PE) for chip-and-pin devices.</p>	<p>PCI certificate received 24th August 2020 for four key payment channels: E-commerce (web forms) Automated Telephone Payments Customer-present using PDQ devices Customer-not-present using PDQ devices Work continues on Seamfone mediated telephone payments and point-to-point chip-and-pin encryption.</p>

<p>A.2562 Icon Programme Board to review all payment methods and revisit preferred methods of taking payments <i>Owner: Rachel Cooper</i></p>	<p>IMG virtual meeting 15th June. ongoing dialogue between finance, ICT and service users</p>	<p>The Council is now compliant in 4 out of 6 areas. Work is ongoing via Income management group to review payment options</p>
<p>R.306 UK failing to agree trade deals with EU, USA and Worldwide <i>Owner: Kevin O Keefe</i> 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 Worldwide. Reviewed: 15/4/2019</p>	<p>SIGNIFICANT (12) Reviewed by SEB 21/04/2020. No changes made.</p>	<p>SIGNIFICANT (12) A further review is to be undertaken on the 2nd December 2020. SEB at its meeting of the 18th November 2020 agreed to retain this rating for the time being.</p>
<p>A.3255 Ongoing monitoring of the situation and appropriate advice and guidance provided to businesses. <i>Owner: Kevin O Keefe</i></p>	<p>Monitoring continues to be undertaken and advice provided to businesses.</p>	<p>Monitoring continues to be undertaken and advice provided to businesses.</p>
<p>R.342 Vulnerable Adults <i>Owner: Matt Bowsher</i> Risk of failure to protect adults in positions of vulnerability due to increasing demand, changing patterns of abuse (e.g. exploitation) and reducing resources Reviewed: 7/12/2020</p>	<p>MAJOR (20) Increased risk to financial sustainability of the sector. The “lock down” leads to high stress environments that exposes vulnerable adults to risk of harm or exploitation; the nature of the isolation keeps the risks and triggers for the need for intervention hidden. The volume and demand on adult social care to provide care and support reduces the ability to meet the needs of individuals with the risk of harm and deprivation to individuals reliant on social care providing a service. There is an increased risk of frauds perpetrated on the public, in particular vulnerable people. SEB update 21/04/2020</p>	<p>MAJOR (20) SEB at its meeting of the 18th November 2020 agreed to retain this rating.</p>

<p>A.2555 Current referral pathway for MASH is multi agency and Care Act Compliant <i>Owner: Stephen Lonsdale</i></p>		<p>The current pathway for safeguarding concerns is robust and Care Act compliant. The business processes for safeguarding have been reviewed and agreed due to the introduction of LAS. This system has improved our ability to extract data relating theme trends and timeframes.</p>
<p>A.2557 Strategic safeguarding training and social media strategy established. <i>Owner: Stephen Lonsdale</i></p>		<p>There are currently two strategic training plans in place. One is the training plan developed and delivered through a blended medium of online and face to face training. The other is the training plan which has been developed by the safeguarding business unit. This training is directed at partners and stakeholders. The multiagency training has been mapped against the differing levels of expertise required by post and seniority. Additionally, there is an electronic booking system which act as an information platform</p>
<p>A.3258 Conversations with stakeholders are taking place and training opportunities have been identified <i>Owner: Stephen Lonsdale</i></p>		<p>Ongoing and will change due to the dynamic nature of this work</p>
<p>A.3259 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 <i>Owner: Stephen Lonsdale</i></p>		<p>The partnership has decided to postpone the LPS priority due to the date of implementation changing as a result of the global pandemic. The partnership has decided to concentrate on protecting people from violence across the life course. A decision to adopt a preventative strategy has been agreed and work streams will reflect this going forward and will be reported to the partnership accordingly. Furthermore it has been recognised the voice of the workforce is essential to the proactive delivery of</p>

		safeguarding from both Childrens and Adults.
A.3260 Work with Trading Standards continues to protect vulnerable adults and is receiving national interest <i>Owner: Stephen Lonsdale</i>		Ongoing and has achieved considerable success, both safeguarding individuals and the organisation from financial abuse. Scams work continues to be adopted by financial institutions after a legal challenge was brought against and won from a high street bank
R.341 Vulnerable Children <i>Owner: Helen Ellis</i> Risk of failure to protect children in positions of vulnerability, due to increasing demand, changing patterns of abuse (e.g. exploitation) and reducing resources. Reviewed: N/A	MAJOR (16) Risk rating increased. Families are hidden from services during lockdown. Concerns that partners have redeployed staff to other services away from safeguarding. SEB update 21/04/2020	MAJOR (16) SEB at its meeting of the 18th November 2020 agreed to retain this rating.
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: Cath Knowles</i>		Recent Ofsted Focussed Assurance Visit has identified a number of areas that require improvement. These were already clearly captured in a revised improvement plan. A new Dept for Education adviser has been agreed and will begin work to support the Directorate and monitoring will continue through Improving Services for Children and Families Board.
R.343 Regeneration Funding <i>Owner: Helen Martin</i> There is a risk post COVID 19 that existing government funded initiatives may not be continue or may continue but with reduced allocations. Work on programmes that are mid bid continue at risk. Reviewed: N/A	MAJOR (16) Risk added April 2020 in light of COVID 19 conditions. SEB update 21/04/2020	MAJOR (16) The Director of Regeneration and Enterprise agreed to retain this rating.

<p>A.3356 Alternative and numerous funding streams and sources <i>Owner: Helen Martin</i></p>		<p>Continued dialogue with WMCA and LEP on funding streams and submitting EOI as and when appropriate. Pipeline of projects maintained and consideration given to multiple streams/EOI to ensure options available if one stream fails.</p>
<p>R.354 Risk of failure to meet the Regulator of Social Housing “Consumer Standard” <i>Owner: Paul Davies</i> Risk of failure to meet the Regulator of Social Housing “Consumer Standard”</p> <p>Reviewed: N/A</p>	<p>SIGNIFICANT (12)</p> <p>We actively monitor progress through our operational performance framework and underpin this risk with actions and performance measures, in particular R.225 - ensuring residents are safe in their homes. This includes compliance health checks and ensuring compliance with various housing policies and procedures. On the basis of supporting evidence, the risk score is set at significant and further, more detailed information can be referred to within Spectrum for results against supporting actions and performance measures.</p>	<p>SIGNIFICANT (12)</p> <p>SEB at its meeting of the 18th November 2020 agreed to retain this rating.</p>
<p>A.3407 Compliance Health check has informed an action to address structural, process and operational issues <i>Owner: Paul Davies</i></p>	<p>A Compliance Health check was progressed with Pennington Choices in Q4 to address known service deficiencies. This was commissioned in Q1 (during COVID-19) No detriment to residents found. Action Plan to be put in place Q2 (now done 4/8/20) Some minor non-compliance with gas and electric (increasing due to no - access / COVID-19) Asbestos policy / procedures to be reviewed from scratch There are outstanding actions relating to FRAs but these are termed low risk and are being assessed being placed on individual programmes or being removed from the assessment as we learn more from discussions with independent external Fire engineer All FRAs are in line with</p>	<p>The Interim Director has overseen a Compliance Health check by Pennington’s Choices in June 2020. This shows there is no serious detriment for DMBC tenants as set out against the Home part of the Consumer Standard, but there are a variety of structural, process and operational issues required to improve performance and address the post Covid backlogs in servicing and testing. These will be actioned and completed within the remainder of 2020/21.</p>

	programme The review of high rise accommodation is progressing - no major structural issues but asbestos and FRA works identified but reducing on again learning from Fire engineer. Safety measures monitored through KPIs	
R.365 Failure to adhere to the Equality Act 2010 and Public Sector Equality Duty. <i>Owner: Kevin O'Keefe</i> The Council is required to comply with the Equality Act 2010 and Public Sector Equality Duty. Besides potential legal consequences of not complying with the Act, there are also reputational consequences and these could impact on recruitment and retention. Reviewed: N/A	N/A	MAJOR (16) SEB at its meeting of the 18 th November 2020 determined that this new risk should be rated Major.
A.3437 Establish a Strategic Equality and Inclusion Leadership Group. <i>Owner: Kevin O'Keefe</i>	N/A	NEW ACTION
A.3438 Develop a new 3-year Equality and Inclusion Strategy and Action Plan (which is outcome focused) <i>Owner: Kevin O'Keefe</i>	N/A	NEW ACTION
A.3439 Performance manage the 17 recommendations from the independent review <i>Owner: Kevin O'Keefe</i>	N/A	NEW ACTION
A.3440 The Chief Executive and delegated Cabinet Member have responsibility and champion Equality and Inclusion <i>Owner: Kevin O'Keefe</i>	N/A	NEW ACTION
A.3441 Identify resources to support the Council to meet its legal equality duties. <i>Owner: Kevin O'Keefe</i>	N/A	NEW ACTION