

Corporate Risk Register

Risk scoring

Risks are assessed on the basis of their likelihood of occurring (from less than 5% up to greater than 50%) and their subsequent impact (ranging from no material impact up to a potential failure of the Council to deliver some or all of its services). A matrix, shown below, is used to provide an overall numerical score.

Impact	CRITICAL	5	5	10	15	20	25
	SERIOUS	4	4	8	12	16	20
	MODERATE	3	3	6	9	12	15
	MARGINAL	2	2	4	6	8	10
	NEGLIGIBLE	1	1	2	3	4	5
			1	2	3	4	5
		VER Y LOW	LOW	MED	HIGH	VER Y HIGH	
		Likelihood					

Corporate Risk Register

Those risks which could have an impact on the functioning of the Council as a whole have been escalated from departmental registers to the Corporate Risk Register. In addition SLT has identified a number of cross cutting risks which have also been included.

There are 18 risks on the Corporate Risk Register, an increase of 3 since the previous quarter.

The new risks concern Climate Emergency (SLT Risk 10, score 16), Development Management (Growth Risk 4, score 15) and Governance (Corporate & Commercial Risk 42, score 9) The RAG status for each risk takes into account mitigating actions being taken to address the risk.

Broken down by directorate these are as follows:

	Green	Amber	Red	Total
Adults	1	1		2

Childrens	1	2	2	5
Communities		2		2
Corporate & Commercial	1	3		4
Growth		3		3
SLT cross-cutting		2		2

i)	Ref: CH Risk 2	Title: Dedicated Schools Grant	Score: 20
Description:			
<p>Failure to control escalating school placement costs for children and young people with special educational needs and disabilities (SEND) due to increases in demand and/or school placement costs. Significant pressure on the High Needs Block of the Dedicated Schools Grant (DSG).</p>			
Mitigating action:			
<ul style="list-style-type: none"> • Open framework agreements and dynamic purchasing system in place for the procurement of SEND placements. An expanded placement commissioning team manages the identification and purchase of placements in line with children's identified needs, and provides challenge to SEND caseworkers where more cost-effective placements may provide similar or improved outcomes for children and young people. • Strengthened decision-making and approval processes have been established. There are quarterly Schools Forum meetings to agree priorities for the DSG. Detailed monthly budget monitoring and reporting is in place with oversight and scrutiny by senior leaders and Board of Directors to agree actions where necessary. A three-year SEND transformation plan has been developed to alleviate the demand and cost of SEND school placements. and this is being monitored by the SEND delivery group and SEND Partnership Board, which is chaired by the Chief Executive. 			
ii)	Ref: CH Risk 3	Title: Placement costs	Score: 20
Description:			

Failure to control escalating placement costs for children in care and leaving care due to increases in demand and/or placement costs.

Mitigating action:

- Open framework agreement and dynamic purchasing system in place for the procurement of care (and SEND) placements. An expanded placement commissioning team manages the identification and purchase of placements in line with children's identified needs, and provides challenge to social work managers where more cost-effective placements may provide similar or improved outcomes for children and young people.
- There is evidence that the team is having a positive impact on reducing individual placement costs. Strengthened decision-making and approval processes have been established including DCS agreement to placements over £2,500 per week. Monthly financial monitoring is in place with oversight and scrutiny by the senior leadership team and reporting to the Board of Directors and Council.

iii)

Ref:CH Risk 4

Title: SEND support

Score: 16

Description:

Failure to provide sufficient, appropriate and timely support to children and young people with SEND and their parents.

Children and young people with SEND do not receive a coherent service that meets their assessed needs leading to poor quality outcomes. The company fails to meet its statutory responsibilities to children with SEND leading to adverse Tribunal judgements and increased costs. There is a poor working relationship with local parents and reputational damage to the company.

Mitigating action:

- The risk score has been increased due to the outcomes of the local area SEND reviews in RBWM and most recently in Kingston. SEND reviews have been completed and have led to the establishment of working groups to improve provision for children with SEND and support for those working with them. The resulting action plans are monitored by the partnership groups in both operational areas. The action plan for Richmond and Kingston will be revised to reflect the findings from the inspection and the Statement of Action issued by Ofsted and the CQC. Performance snapshots include key performance indicators to give early warning if service quality and reliability starts to reduce. Additional staffing

resources have been agreed to manage the increased demand for Education, Health and Care Plans. A Programme Director has been appointed to lead the SEND transformation programme in Kingston and Richmond.

iv)

Ref: SLT Risk 1

Title: Brexit preparedness

Score: 16

Description:

Impact of Brexit on the council services and preparedness for such.

Key issues may include (but are not restricted to): limitations on movement of workers affecting staffing for RBK's partners which utilise or sub-contract to firms with high proportions of EU workers (e.g. ASC / Waste Services); legislation changes across regulatory areas and procurement; goods and services that may be subject to tariffs and border checks; restrictions on EU funding for VCS and charitable sector; local businesses that have customer / supply chains that cross EU boundaries facing increasing costs / delays - and the possible knock-on effect for Business Rates revenue.

Mitigating action:

- RBK has stepped up its contingency planning in relation to the potential impacts of a 'hard Brexit'. The Council is closely involved with the London Resilience Forum and the LGA to share learning and best practice, and attends briefing events when arranged by Central Government.
- The Director, Communities has been identified as the Chief Officer coordination lead for RBK and an internal Task & Finish Group (T&FG) has been created, coordinated by the Emergency Planning Manager, which brings together senior officers from across key service areas to assess risk/impact and develop mitigations.
- A set of key work streams has been develop to be overseen by the T&FG and an action log created. Engagement has begun with local partners via the Kingston Strategic Partnership and direct contact to schools and Kingston Hospital.
- As one of the highlighted risks for the 12 March Audit Committee a report of Brexit preparations in order to provide further detail and assurance of actions in hand.

v)

Ref: SLT Risk 10

Title: Climate Emergency

Score: 16

Description:

The Council has declared a climate emergency and the potential financial impact

this could have to reach net or zero carbon emissions by 2038.

Mitigating action:

- Climate Emergency Working Group of cross council senior officers mobilised to look at options, assess risks and issues and make recommendations to EAST.
- Any proposals for additional activity beyond what is already in the Corporate Plan will need to be considered as part of the annual budget process in the normal way..

vi)

Ref: AD Risk 6

Title: Homelessness

Score: 15

Description:

Welfare reforms and particularly the roll out of Universal Credit (UC) resulting in increased risk of homelessness across tenure

Mitigating action:

- There is a Corporate Prevention Group focussing on the impacts of Welfare Reforms, which all key partners attend.
- The Welfare Reform team within Housing Options work proactively with affected households and the Financial Inclusion Team (FIT) also assist RBK tenants with financial difficulties.

vii)

Ref: CH Risk 5

Title: Inspection risks

Score: 15

Description:

Children's services are judged to be inadequate following an inspection of services for children and young people. There is a failure to trust in the company's ability to protect and promote the education, health and care of children and young people. This may lead to significant reputational damage to the company. Additional management and financial resources are required to improve services.

Mitigating action:

- The risk score has been increased following the outcome of the local area SEND inspection because it highlighted a gap in the evidence bank and multi-agency preparation for this particular inspection.
- Effective plans in place to prepare the organisation for inspection including an inspection plan and self-assessment process; however, the focus has been on social care inspections and readiness arrangements are in the process of being strengthened to better reflect the requirements of SEND and health service inspections.
- Learning and Improvement Plans identify areas for improvement and are

monitored by the Director of Improvement. These are informed by an established programme of performance monitoring and quality assurance activity including casework audits and Practice Weeks. Employees receive regular training, development sessions and briefings to ensure effective practice and inspection readiness.

viii)	Ref: GR Risk 20	Title: Roll-out of Universal Credit	Score: 15
-------	-----------------	-------------------------------------	-----------

Description:

Data from other areas which have had roll out of full service Universal Credit (UC) have indicated an increase in rent arrears and substantial demands on staff.

Mitigating action:

- There is a Corporate Prevention Group focussing on the impacts of Welfare Reforms, which all key partners attend. We have the Financial Inclusion Team who assist tenants with financial difficulties, pilot looking at the sign up process to flag new tenants at risk, co-location of DWP at Guildhall has helped with resolving issues.
- There is a flag on UH so rent arrears for UC tenants can be measured separately. Bad debt provision has been increased to account for UC debt.

ix)	Ref: GR Risk 25	Title: Existing property portfolio Income Exposure	Score: 15
-----	-----------------	--	-----------

Description:

Of the 163 'Investment properties' in ownership, approximately 58% of investment property income is derived from just 2 properties in Kingston town centre (John Lewis & Conquest House/Kings Place) creating an income exposure risk.

Mitigating action:

- Strategic grading review of all assets completed to assess contribution and exposure by asset. Guildhall Capital Ltd approved to limit Kingston 'global' income and geographical/income exposure from any single asset's performance. Maintain close relationship with tenant/leaseholder of exposed assets. Consider transfer of assets to new property company once incorporated subject to taxation and legal advice. Immediately consider outsourcing of property management to external company where this supports risk mitigation. Commencement of options appraisal programme on poorly performing assets.

x)	Ref: GR Risk 4	Title: Development Management	Score: 15
<p>Description: Failure of determination of planning applications within government targets or deliver pre-application service, or costs awards on appeals, which would impact on service reputation and financial costs.</p>			
<p>Mitigating action:</p> <ul style="list-style-type: none"> An external review of the service is underway and is due to conclude in early July 2019. Additional resource has been brought into the team with further support still to come. A service improvement Action Plan is being implemented to target these new resources and focus on the other key improvements necessary. The Council website will continue to be updated to provide the latest information to customers. 			
xi)	Ref: C&C Risk 13	Title: Delivery of savings	Score: 15
<p>Description: Transformation plans and savings programmes for 2018/19 and 2019/20 are delayed or do not realise savings as planned leading to both in-year overspends and/or significant financial pressures in future years. This could reduce our already low reserves and place the Council at significant risk of financial instability.</p>			
<p>Mitigating action:</p> <ul style="list-style-type: none"> SLT receive a monthly update of savings RAG ratings as part of the budget monitoring update. For 2019/20 there are early indications that some of the planned savings will not be delivered in year and so work is underway to identify how far these can be mitigated. This arises from changes in political appetite for some of the initiatives and lack of capacity to progress some plans as quickly as originally intended. The first detailed review will be reported to SLT in month 3 and this should identify the level of savings that we already know is not going to be delivered and needs to be mitigated, and will indicate the likely impact on 2020/21 financial year. Directors will be expected to identify alternative savings as far as possible and/or seek additional investment to enable the savings to be delivered. 			
xii)	C&C Risk 14	Title: Managing growth	Score: 15
<p>Description: Increases in demand for support from adults and childrens' care services, as well</p>			

as legislative changes in Housing and adverse impact of extreme weather on highways are all putting pressure on Council budgets. Some of these demand trends are expected to continue and there is a risk that this is not containable within existing budgets without interventions. The MTFs has limited scope to offer budget growth in any area and consequently we need to deliver changes in what and how we deliver to ensure that increased demand can be met within the cost envelope.

Mitigating action:

- Growth needs have been assessed as part of the 19/20 budget setting process and budget has been allocated to meet unavoidable pressures. Monthly budget review and monitoring will help us identify growth pressures early in 19/20 and delivery against savings plans will be tracked.
- Some of these proposals are intended to reduce demand which in turn will reduce the potential for future growth pressures.
- Budget readiness process was instigated in March 2019 and has helped provide early indication of risk areas. Future risks are being discussed through the star chambers with the intention of identifying mitigating actions and planning adequately in the 2020+ MTFs.

xiii)

C&C Risk 15

Title: Funding changes

Score: 15

Description:

2018/19 is the last year of a 4-year funding settlement. Future funding will be determined by the spending review, the fair funding review, business rates retention and the London Pilot as well as specific funding initiatives such as the Better Care Fund (due to end in 2 years). There is a risk that these changes could adversely affect the level of funding received by the Council and consequently require increased levels of savings to be delivered. There is also the risk that the high levels of uncertainty mean our financial plans contain a high level of assumptions that could prove to be inaccurate. This would impact strategic decision making and reduce confidence in the Council's ability to manage within budget.

Mitigating action:

- The SFS will analyse all technical funding announcements and provide input to all consultations on the spending review, fair funding and business rates. Networks with the Society of London Treasurers, the Deputy Treasurers

Group and technical forums enable us to receive information early and benefit from a wide range of expertise across London.

- Regular review and stress testing of the MTFP will enable us to test resilience and benchmark our assumptions against other Councils. There has been no recent updates from Government regarding when the 2020/21 funding will be determined so we are currently still making a number of assumptions in our financial plans about our core funding streams. These are regularly tested against the practice of other boroughs and our approach is considered to be both prudent and in line with assumptions other London borough's are making.

xiv)	COM Risk 10	Title: Emergency planning	Score: 15
------	-------------	---------------------------	-----------

Description:

Robustness of local arrangements and responding to changes to London wide Emergency Planning requirements, if not implemented could affect RBK ability to respond to local and pan London emergencies and support local residents, businesses and partners.

Mitigating action:

- Implementation of LA actions from Emergency Planning 2020 and Standardisation program.
- A new command and control structure introduced from February 2019 - Council Gold, Silver and Local Authority Liaison Officers.
- All plans and capability documents are being reviewed to align with standardisation and London Concept of operations. Internal Council Desk top exercise to be delivered June 2019.

xv)	COM Risk 12	Title: Service delivery	Score: 15
-----	-------------	-------------------------	-----------

Description:

Cyber Security - Old and unsupported operating systems, lack of staff awareness and training, cyber attack etc - leading to data loss or loss of systems for a period of time.

Mitigating action:

- Links to LGA, NCSC to develop and evolve the skills needed. Cyber security manager leading with changing and improving Council Systems, PSN test, cyber essentials. Staff have undertaken Information Governance training and phishing test completed.

- As one of the highlighted risks for the 12 March Audit Committee a report on Cyber Security and Information Governance was taken to the Audit Committee on 12 March.

xvi)	AD Risk 1	Title: Adult safeguarding	Score: 10
------	-----------	---------------------------	-----------

Description:

A serious safeguarding failure occurs. Need to undertake DoLs assessments in time.

The adult in question will come to harm which could result in litigation against the council and a corresponding loss of income and adverse publicity against the council.

Mitigating action:

- We have carried out a great deal of work to improve the standard of adult safeguarding in Kingston.
- We have now improved training for staff, centralising triaging in the Access Team to make decision making more consistent and all staff are now more skilled in undertaking enquiries.
- Improving processes: The safeguarding forms used by social work staff are now integrated within the IAS system and further work is planned to review the safeguarding module to ensure it is fit for practice in assisting practitioners to record their work. We are working towards developing our making safeguarding personal group to ensure this feeds into our feedback and development of training.
- Triaging of safeguarding cases now takes place centrally; the Safeguarding Team and Short Term Team have now merged, which ensures that the service is more robust and resilient.
- Comprehensive Safeguarding Audit to improve quality, enhance practice to make safeguarding personal, with individuals at the heart of the work is completed.
- Further links are being made with safer kingston to link in with the domestic abuse, hate crime, modern slavery and human trafficking agenda.

xvii)	CH Risk 1	Title: Childrens safeguarding	Score: 10
-------	-----------	-------------------------------	-----------

Description:

A serious safeguarding failure occurs

- The child in question will come to harm.
- There may be litigation against the council and a corresponding loss of income.

- There would be adverse publicity against the council.

Mitigating action:

- Clear mechanisms in place for reporting concerns about a child.
- Clear Threshold Framework in place through Single Point Access and Multi Agency Safeguarding Hub (MASH).
- Local Safeguarding Children's Board. Arrangements in place to transfer to new strategic and operational framework following national review of LSCBs.

xviii)

C&C Risk 42

Title: Governance

Score: 9

Description:

The council does not comply with legal or statutory obligations or acts outside its powers or its governance of information is not robust resulting in loss of protected data potentially leading to successful legal challenge, financial penalties, court sanctions safeguarding issues and reputational damage.

Mitigating action:

- Reset arrangements for shared legal service to ensure relevant officers can access advice on a risk basis.
- Deliver regular training sessions for members and officers focussing on key issues such as their role in arms-length bodies.

Risk Management Framework

The Council needs a more robust approach to risk management, and for greater consideration of risk to become embedded within day-to-day working.

A new risk management framework has been produced and approved by SLT. The framework sets out the Council's approach to how risk is managed, including practical guidance on risk identification, analysis and scoring; monitoring and reporting; and an overview of governance arrangements.

Workshops for Directorate management teams will be run later in August and September to introduce the framework to senior managers, together with developing an intranet presence and further practical guidance for officers in managing risk.

The framework and these new arrangements should assist services in managing risk, and provide a more consistent approach to assessing the likelihood and impact of risk and to improve the quality of risk monitoring.