BIRMINGHAM CITY COUNCIL

PUBLIC REPORT

Report to:	**Audit Committee**
Report of:	**Assistant Director, Audit & Risk Management**
Date of Meeting:	**16th December 2019**
Subject:	**Corporate Risk Register Update**
Wards Affected:	**All**

1. Purpose of Report

1.1 To update the Audit Committee on the management of risks and issues contained within the Corporate Risk Register (CRR); Appendix A. A risk heat map together with an index of risks, showing the direction of travel, are also included.

2. Recommendation

2.1 That the Audit Committee:

i) notes the CRR updates detailed in Section 3 below; and

ii) review the CRR and assess whether the risk ratings and actions are reasonable / effective or if further explanation / information is required in order to satisfy itself that the Risk Management Framework has been consistently applied.

3. Changes to the CRR

3.1 Reworded Risk

Risk	From	To	Page
17	Ineffective Corporate Risk Marker IT Solution	Staff harm by not sharing data effectively	46

A project group is being establish to restate Risk 17 and develop a supporting action plan.

3.2 Decreased Risk Ratings

Risk		From	To	Page
7	Culture change & transformation	High / High	Medium / Medium	65
12	Equality Act	Significant / Significant	Medium / Significant	33
10	Transformation	Significant / Significant	Significant / Medium	67

3.3 Risk Profile

The current risk profile is summarised below:

Risk Category	Severe	Material	Tolerable	Total
Safeguarding / Welfare	4	1	0	5
Statutory Responsibilities	2	7	1	10
Financial Resilience	2	3	0	5
Political	0	0	0	0
Technology	1	0	0	1
Transformation	0	4	0	4
Service Delivery	1	2	0	3
Total	**10**	**17**	**1**	**28**

4. Background Information

4.1 Members have a key role within the risk management and internal control processes.

4.2 The Audit Committee terms of reference, sets out its responsibilities and in relation to risk management these are:

- providing independent assurance to the Council on the effectiveness of the risk management framework and the associated control environment;
- whether there is an appropriate culture of risk management and related control throughout the Council;
- to review and advise the Executive on the embedding and maintenance of an effective system of corporate governance including internal control and risk management; and
- to give an assurance to the Council that there is a sufficient and systematic review of the corporate governance, internal control and risk management arrangements within the Council.

5. Corporate Risk Register Update

5.1 The CRR is aligned to the corporate objectives of the Council and identifies the key risks to be managed at a corporate level.

5.2 The Council Leadership Team (CLT) and the Deputy Leader review the CRR on a monthly basis to strengthen oversight arrangements and have agreed to the above changes. CLT are developing a Strategic Risk Register to give increased focus to risks which require leadership direction or impact directly on the ability of the Council to deliver its objectives and priorities. This will be brought to the Committee in early 2020.

6. Risk Management Framework

6.1 The Council's Risk Management Strategy, Policy and Toolkit have been reviewed and consolidated into a single Risk Management Framework. This revised Framework, which places greater emphasis on the actions that are required to the manage risks, was approved by the Audit Committee at its January 2019 meeting.

6.2 Tools to support the implementation of the framework, guidance for managers and an E-learning module, have been developed and made accessible via the Council's Intranet.

6.3 All risks have been comprehensively reviewed, transferred into the new template and action plans established. Each action has been assigned a R.A.G status as follows:

Red	Target date will not be achieved; significant difficulties encountered delivering the action.
Amber	Slight slippage against the target date. Action will be substantially delivered.
Green	On track, action will be fully delivered by the target date.

We are working closely with directorate risk representatives to continue to develop and strengthen action plans. Completed actions will be removed after they have been reported to Audit Committee.

7. Embedding Risk Management

7.1 There are directorate risk registers in place supported by individual risk registers for service areas. Monthly updates are facilitated through the

Directorate Risk Representatives.

7.2 The current main route to provide risk management awareness is the e-learning package for managers, accessed via the internet. All documents and web pages have been refreshed.

7.3 Service managers are asked about their risk management arrangements as part of routine audit work.

7.4 Corporate Directors are required to provide an annual assurance that they have embedded risk management to support the Annual Governance Statement.

8. Legal and Resource Implications

8.1 The work carried out is within approved budgets.

9. Equality Impact Assessment Issues

9.1 Risk management forms an important part of the internal control framework within the Council.

9.2 The Council's risk management strategy has been Equality Impact Assessed and was found to have no adverse impacts.

10. Compliance Issues

10.1 Decisions are consistent with relevant Council Policies, Plans and Strategies.

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Risk Heat Map

Risk Map – November 2019

Likelihood	Low	Medium	Significant	High
High		Risk of fines re air quality (R34)	Highways PFI – Core Investment deliverables (R6) The Early Years Health and Well Being Contract (R43) Schools Deficits – National funding arrangements have resulted in real term funding reductions (R41)	Compliance re Counter Terrorism & Security Act (R26)
Significant		Equal Pay claims (R1) Improvement Activity Progress (R10) Statutory homeless service (R31)	Malicious attacks of web based services (R16) Failure of STP to deliver change/improve health & wellbeing (R33)	Improving children's safeguarding (R2) Travel Assist – cost of provision and ability to deliver the agreed level of service (R42)
Medium		Failure to Deliver Culture Change and Transformation (R7) Commonwealth Games – Athletes Village (R40) Not divesting of property assets (R15) Evaluation of service delivery options (R18) Universal Credit (R46) Allowance Payments (R44) Staff Harm by not sharing data effectively (R17) Delivery of HS2 following Royal Assent of the HS2 Act (R39)	Loss of personal/ sensitive data (R11) Responding to emergency incidents including acts of terrorism (R32) Compliance to timescales for DoLS referrals (R25) Compliance to Equality Act 2010 & PSED (R12) Management of the Enterprise Zone Programme in line with its delivery Plan (R38)	Containing expenditure within approved budget (R29) Homeless Reduction Act (R37)
Low	Grenfell Tower Enquiry (R36)			

Key	Impact
Severe	Immediate control improvement to be made to enable business goals to be met and service delivery maintained/improved.
Material	Close monitoring to be carried out and cost effective control improvements sought to ensure service delivery is maintained
Tolerable	Regular review, low cost control improvements sought if possible.

Risk Index

INDEX OF RISKS – PREVIOUS UPDATES

Safeguarding / Welfare

Risk No.	Risk Title	Page No.	Actual Rating May 2019 L / I	Actual Rating June 2019 L / I	Actual Rating July 2019 L / I	Actual Rating August 2019 L / I	Actual Rating September 2019 L / I	Actual Rating October 2019 L / I
2	Not responding fully and effectively to the improvement agenda for children - Failure to improve children's safeguarding and children's social care.	12	S/H ↔	S/H ↔	S/H ↔	S/H ↔	S/H ↔	S/H ↔
32	Risk of significant disruption to Council services and failure to effectively manage and respond to emergency incidents, including acts of terrorism.	15	S/H ↔	S/H ↔	M/S ↓	M/S ↔	M/S ↔	M/S ↔
33	Failure of the Council to make its contribution to deliver a step change to the Health and Social Care system resulting in an improvement to the health and well-being of Birmingham citizens.	16	S/S ↔	S/S ↔	S/S ↔	S/S ↔	S/S ↔	S/S ↔
42	Travel Assist There are risks within the service over the cost of the provision and ability to deliver the agreed level of service within the agreed budget.	18	S/H ↔	S/H ↔	S/H ↔	S/H ↔	S/H ↔	S/H ↔
43	Early Years Health and Well Being contract There are risks that the assumed financial savings from the contract will not be fully realised due to unforeseen costs and possible grant claw-backs.	20	H/S ↔	H/S ↔	H/S ↔	H/S ↔	H/S ↔	H/S ↔

Statutory Responsibilities / Compliance with Statutory Responsibilities

Risk No.	Risk Title	Page No.	Actual Rating May 2019 L / I	Actual Rating June 2019 L / I	Actual Rating July 2019 L / I	Actual Rating August 2019 L / I	Actual Rating September 2019 L / I	Actual Rating October 2019 L / I
1	Management of equal pay claims.	22	S/H ↔	S/H ↔	S/H ↔	S/M ↓	S/M ↔	S/M ↔
26	Failure to comply with all of the requirements of the Counter Terrorism and Security Act (2015) and the Prevent Duty.	25	H/H ↔	H/H ↔	H/H ↔	H/H ↔	M/H ↓	H/H ↑
31	Increased pressure on the statutory homeless service.	27	H/H ↔	H/H ↔	S/S ↓	S/M ↓	S/M ↔	S/M ↔
34	Risk of fines being passed down to Local Authorities in relation to air quality / ongoing fines related to not meeting air quality compliance.	31	H/M ↔	H/M ↔	H/M ↔	H/M ↔	H/M ↔	H/M ↔
12	Failure to comply with all the requirements of the Equality Act 2012 and the Public Sector Equality Duty.	33	M/S ↔	M/S ↔	S/S ↑	S/S ↔	M/S ↓	M/S ↔
25	Failure to comply with statutory timescales in relation to DoLS (Deprivation of Liberty) referrals, which could lead to legal challenge and result in financial loss to the Council.	35	M/S ↔	M/S ↔	M/S ↔	M/S ↔	M/S ↔	M/S ↔
11	The loss of significant personal or other sensitive data	38	M/S ↔	M/S ↔	M/S ↔	M/S ↔	M/S ↔	M/S ↔
36	Failure to respond positively and effectively to the required outcomes of the Grenfell Tower enquiry once known.	40	L/M ↔	L/M ↔	L/M ↔	L/L ↓	L/L ↔	L/L ↔

Risk No.	Risk Title	Page No.	Actual Rating May 2019 L / I	Actual Rating June 2019 L / I	Actual Rating July 2019 L / I	Actual Rating August 2019 L / I	Actual Rating September 2019 L / I	Actual Rating October 2019 L / I
37	Homelessness Reduction Act – Insufficient council resources to meet the requirements of the Act fully.	42	M/H ↔	M/H ↔	M/H ↔	M/H ↔	M/H ↔	M/H ↔
17	Staff Harm by not sharing data effectively.	46	M/M ↔	M/M ↔	M/M ↔	M/M ↔	M/M ↔	M/M ↔

Financial Resilience

Risk No.	Risk Title	Page No.	Actual Rating May 2019 L / I	Actual Rating June 2019 L / I	Actual Rating July 2019 L / I	Actual Rating August 2019 L / I	Actual Rating September 2019 L / I	Actual Rating October 2019 L / I
29	Not developing sufficiently robust plans to support setting a balanced budget (including in the medium term), and not containing net spending within the approved budget.	48	M/H ↔	M/H ↔	M/H ↔	M/H ↔	M/H ↔	M/H ↔
15	Not recognising the need to divest of costly property assets in radical new solutions to reframe service delivery.	52	M/M ↓	M/M ↔	M/M ↔	M/M ↔	M/M ↔	M/M ↔
38	Management of the Enterprise Zone Programme in line with its delivery plan	55	M/S ↓	M/S ↔	M/S ↔	M/S ↔	M/S ↔	M/S ↔
41	School Deficits National funding arrangements have resulted in real term funding reductions	57	H/S ↔	H/S ↔	H/S ↔	H/S ↔	H/S ↔	H/S ↔
46	Universal Credit risks	61	M/M ↔	M/M ↔	M/M ↔	M/M ↔	M/M ↔	M/M ↔

Political

None.

Technology

Risk No.	Risk Title	Page No.	Actual Rating May 2019 L / I	Actual Rating June 2019 L / I	Actual Rating July 2019 L / I	Actual Rating August 2019 L / I	Actual Rating September 2019 L / I	Actual Rating October 2019 L / I
16	That web services to customers or work with partners may be disrupted by malicious attacks on the City Council's web based services.	63	S/S ↔	S/S ↔	S/S ↔	S/S ↔	S/S ↔	S/S ↔

Transformation

Risk No.	Risk Title	Page No.	Actual Rating May 2019 L / I	Actual Rating June 2019 L / I	Actual Rating July 2019 L / I	Actual Rating August 2019 L / I	Actual Rating September 2019 L / I	Actual Rating October 2019 L / I
7	Lack of capacity and capability to respond to employee relations tensions, poor service, performance issues, sickness absence levels and poor morale due to organisational downsizing and pay freezes.	65	H/H ↔	H/H ↔	S/H ↓	H/H ↑	H/H ↔	M/M ↓

Risk No.	Risk Title	Page No.	Actual Rating May 2019 L / I	Actual Rating June 2019 L / I	Actual Rating July 2019 L / I	Actual Rating August 2019 L / I	Actual Rating September 2019 L / I	Actual Rating October 2019 L / I
10	Failing to make sufficient progress in key areas of improvement activity	67	S/S ↔	S/S ↔	S/S ↔	S/S ↔	S/M ↓	S/M ↔
18	Failure to adequately evaluate the costs and benefits of alternative delivery models. Failure to fully implement the decisions made to change policy and service delivery.	68	M/M ↔	M/M ↔	M/M ↔	M/M ↔	M/M ↔	M/M ↔
44	Allowance payments	71	M/M ↔	M/M ↔	M/M ↔	M/M ↔	M/M ↔	M/M ↔

Service Delivery

Risk No.	Risk Title	Page No.	Actual Rating May 2019 L / I	Actual Rating June 2019 L / I	Actual Rating July 2019 L / I	Actual Rating August 2019 L / I	Actual Rating September 2019 L / I	Actual Rating October 2019 L / I
6	Failure to achieve all of the services required including delivery of significant investment into the Highway network within the first five years of the contract.	72	H/S ↔	H/S ↔	H/S ↔	H/S ↔	H/S ↔	H/S ↔

Risk No.	Risk Title	Page No.	Actual Rating May 2019 L / I	Actual Rating June 2019 L / I	Actual Rating July 2019 L / I	Actual Rating August 2019 L / I	Actual Rating September 2019 L / I	Actual Rating October 2019 L / I
39	HS2 Delivery of HS2 following Royal Assent of HS2 Act. BCC role to help facilitate delivery of new railway (including Curzon Station and depot). Maximise benefits for City and minimise/mitigate impact during construction.	74	**M/M** ↓	**M/M** ↔	**M/M** ↔	**M/M** ↔	**M/M** ↔	**M/M** ↔
40	Commonwealth Games – Athletes Village Delivery of the Athletes Village dependant on the funding & acquisition of land in addition to potential changes to sporting schedules affecting the village's capacity to accommodate athletes.	76	**M/M** ↔	**M/M** ↔	**M/M** ↔	**M/M** ↔	**M/M** ↔	**M/M** ↔

Corporate Risk Register

Safeguarding / Welfare

Risk No: 2	Risk Title: Safeguarding Children

Risk Description:

- Not responding fully and effectively to the improvement agenda for Children
- Failure to improve children's safeguarding and children's social care

Risk Owner: Director, Education and Skills	Risk Lead: Lead: Assistant Director Commissioning , Education and Skills	Risk Type / Category: Customer / Citizen

Inherent / Gross Risk			Residual / Current Risk			Target Risk		
Likelihood	Impact	Prioritisation	Likelihood	Impact	Prioritisation	Likelihood	Impact	Prioritisation
Significant	High	Severe	Significant	High	Severe	Medium	Significant	Material

Current Controls Mitigating Inherent Risk:

- Service Delivery Contract is in place and Commissioning arrangements are being developed to manage the Contract with the Trust.
- A monthly Operational Commissioning Group meets to consider performance and contract issues; this will also include risk updates and will be chaired by Tim O'Neill.
- Annual contract review.

Sources of Assurance on Effectiveness of Identified Controls:

- Noting the positive steps from the recent Ofsted Safeguarding Inspection carried out in December 2018 and that Birmingham now is rated as "Requires Improvement to be Good"
- Birmingham Children's Trust Adoption Agency received a positive outcome from their first adoption inspection, held in February this year. The service was judged to be 'good' overall and leadership and management was judged to be 'outstanding'.
- The Lead Member for Children's Services will meet regularly with the Chief Executive of the Trust to be briefed on progress.
- KPI'S agreed with Trust at OCG in April. Throughout the next year a review of the contract will be carried out to take effect from 1 April 2020.
- Internal Audit completed reviewing audit compliance of BCT

No.	Actions to Reduce Risk to Target	Owner	Target	Progress	RAG

Safeguarding / Welfare					
Risk No: 2	**Risk Title:** Safeguarding Children				
			Date		
1	Remodel the Virtual School's procedures, to ensure educational progress is reviewed and supportive interventions implemented, to enable all looked after children to make good progress.	Assistant Director Inclusion and SEND	January 2020	• New Head of Birmingham Virtual School started in September. Development/collaborative work with outstanding LA Virtual Schools in Suffolk and Leeds ongoing to inform future local area practice. Appointment of Virtual School Headteacher is from an Outstanding Virtual School (March 2019) and will also develop collaborative working with other large Virtual Schools through NAVSH national association. • Review of Governance model and approach due to conclude 31st of October with report with findings and recommendations to be presented to full governing board. The Virtual School Headteacher will act on the governance review, create new terms of reference and membership for governance in a full board meeting 21st November. The governance will align with the performance matrix of Birmingham's Corporate Parent Board and the audit findings commissioned in Summer 2019 of the Virtual School. • All members of the virtual school are currently reporting on individual progress and actions in relation to raising attendance, raising attainment and raising the quality of the PEPs. There will be termly review of this across the staff by the Virtual School Headteacher. • The Virtual School Headteacher will review current role profiles and structures across the service in Autumn term 2019 to ensure alignment with service plans and delivery. Recruitment into vacant posts will be required by January 2020. • An audit of the Virtual School was undertaken by the audit team in summer 2019. Report findings currently being shared with directorate and will inform future structures and workstreams for 2020.	**Amber**

Safeguarding / Welfare					
Risk No: 2	**Risk Title:** Safeguarding Children				
				• Programme of Joint planning and working in place between BCC AD for SEND and Director from BCT to ensure strong collaboration and appropriate interdependencies between the work of BCT and BCC Education Services. • BCC AD for SEND and BVS Headteacher to attend BCT Executive Board 14th October to share audit review findings and BVS Headteacher's overview of the BVS from her first month in role. • Monthly meeting with BCC PSS Business Support Manager to discuss progress against previous BVS PSS review and current business needs. • Regular meetings set up between BCT Corporate parent Manager and Headteacher of BVS to agree new partnership working for academic year 2019-20. • Work is developing with BCC Early Years and BCC 14-19 officers to support CIC and work of BVS around education planning and the writing of effective Personal Education Plans.	
2	Review of Safeguarding arrangements in Commissioned Services Review of internal compliance and controls	AD Education & Skills Safeguarding – School Advisor	September 2019	Following an initial audit of the Home to School transport service; a service specific safeguarding review tool has been developed. A pilot of 3 providers will be undertaken. Officers from Education Safeguarding and Home to School Transport will work together to ensure that the audit tool supports both compliance and good practice. A review of commissioned services is being developed in conjunction with the Education Safeguarding team and Internal Audit. This will look at safeguarding governance and compliance. This will be developed with the support of the	**Amber**

Safeguarding / Welfare					
Risk No: 2	**Risk Title:** Safeguarding Children				
				Safeguarding Board to capture best practice in this area. An internal review of the current Section 11 audit process to be carried out and areas for development to be identified and actioned	
Updated BY:	E&S Risk Rep	Date:	24/10/19		

Safeguarding / Welfare								
Risk No: 32	Risk Title: Risk of significant disruption to Council services and failure to effectively manage and respond to emergency incidents, including acts of terrorism.							
Risk Description: Risk of significant disruption to Council services and failure to effectively manage and respond to emergency incidents, including acts of terrorism.								
Risk Owner: Chief Executive	**Risk Lead:** Head of Resilience (HOR)		**Risk Type / Category:** Customer / Citizen					
Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
Significant	**Significant**	**Severe**	**Medium**	**Significant**	**Material**	**Low**	**Significant**	**Material**
Current Controls Mitigating Inherent Risk: - Corporate and Multi-Agency emergency plans in place. - Working with partners in all areas - 24/7 out of hours emergency duty officer service in place including emergency control room. - Experienced Emergency Planning Professionals in place - New Emergency Plan launched New BC Plan Launched and EP & BC Promotion.						**Sources of Assurance on Effectiveness of Identified Controls:** - Training delivered - Test and exercise results - Annual exercise - Delivery of wider engagement and validate		

Safeguarding / Welfare

Risk No: 32	Risk Title: Risk of significant disruption to Council services and failure to effectively manage and respond to emergency incidents, including acts of terrorism.

- BC Programme roll out
- Roles and people identified.
- Training & Exercising programme established
- Command team meeting
- New response and duty process implemented.
- Further review of wider response arrangements underway.
- Regular risk reviews eg workshops,risk meetings to assess risk position.

No.	Actions to Reduce Risk to Target	Owner	Target Date	Progress	RAG
1	Full review of risk to be carried out and plan to be developed	Head of Resilience (HOR)	End July 2019	Risk review workshop carried out late June to review current risk position.	Green
2	Maintain and review controls	HOR		Ongoing	Amber
Updated BY:	HOR	Date:	25/10/2019		

Safeguarding / Welfare

Risk No: 33	Risk Title: STP (Sustainability Transformation Programme)

Risk Description: Failure of the STP to deliver a step change to the Health and Social Care system resulting in an improvement to the health and well-being of Birmingham citizens.

Risk Owner: Director for Adult Social Care (DASS)	Risk Lead: Director for Adult Social Care	Risk Type / Category: Social

Inherent / Gross Risk	Residual / Current Risk	Target Risk

Safeguarding / Welfare

Risk No: 33	Risk Title: STP (Sustainability Transformation Programme)							
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
High	**Significant**	**Severe**	**Significant**	**Significant**	**Severe**	**Low**	**Medium**	**Tolerable**

Current Controls Mitigating Inherent Risk:

The STP "purpose" is evolving under new leadership. A draft vision and values has been developed and under consideration by the STP Board.

The revised STP purpose has been accepted by the STP Board

Sources of Assurance on Effectiveness of Identified Controls:

STP board which is represented by the Leader / Cllr Hamilton, CEO and Graeme Betts.

No.	Actions to Reduce Risk to Target	Owner	Target Date	Progress	RAG
1	STP is a standing item on the Health and Wellbeing Board; bi-monthly meetings to receive updates from the Birmingham and Solihull CCG. Graeme Betts is a member of the STP Programme Board and Justin Varney (started February 2019) is a member of the Development and Delivery Board. Public Health is currently auditing the involvement in the BSol STP process to ensure appropriate engagement.	Director of Adult Social Care (DASS)	Ongoing	Ongoing Action The Council supports the Health and Wellbeing Board with live web casting and publically available papers.	Amber
2	The STP Board has agreed its strategy and is engaging with the public and stakeholders. Work streams have been agreed and priorities identified. There is a high degree of commitment amongst the partners. The main risk is that the work streams are not all as well-advanced as others which means that the risk that	DASS	Ongoing	Ongoing Action The [Adult Social Care] Directorate continues to be an active partner on the Sustainability and Transformation Plan (STP) and in leading the STP Birmingham Older People Programme. The Assistant Director Commissioning is the SRO [Senior Responsible Officer] for the Prevention work stream and other officers act as project leads across work streams. Specific activity in support of the Programme includes procurement and contract management of the Early Intervention External Support	Amber

Safeguarding / Welfare					
Risk No: 33	**Risk Title: STP (Sustainability Transformation Programme)**				
	improvement for some citizens may take longer than would be desirable.			Partner. Future activity through the partnership will include the development of integrated commissioning arrangements.	
Updated by: Risk Rep, – No further update at this time		Date:	15/10/19		

Safeguarding / Welfare		
Risk No: 42	**Risk Title:** Travel Assist	
Risk Description: •There are risks within the service over the cost of provision and ability to deliver the agreed level of service within the agreed budget. •There are also wider service risks about the capacity of the market to deliver this service and the reliance upon a single provider due to limited minibus capacity. •Birmingham has a higher than average number of children with SEN (17.8% in the city; 15.5% nationally). •Travel Assist supports over 5,700 children and young people to an educational setting. Of these, over 4,200 are on some form of specialised transport (mini-bus/coach/one-to-one transport). •The TA budget for the last few years has been artificially low. It was significantly reduced to £13.6m in 2016/17 which resulted in 2016/17 in a £5.3m overspend (£18.9m), and an unprecedented number of complaints and negative attention placed on the service and BCC. •Over the course of the academic year 2016/17 90% of the change programme was delivered and while the TA budget was increased for 2018/19 the service still wasn't able to deliver the budget savings. •Recent risks have been realised with the contractor Accessible Transport Group Contract Services Limited (ATGCSL) going into administration but work has been undertaken to implement contingency planning and develop future options.		
Risk Owner: Director, Education and Skills	**Risk Lead:** Lead: Assistant Director Commissioning , Education and Skills	**Risk Type / Category:** Customer / Citizen
Inherent / Gross Risk	**Residual / Current Risk**	**Target Risk**

Safeguarding / Welfare

Risk No: 42	Risk Title: Travel Assist							
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
Significant	High	Severe	Significant	High	Severe	Medium	Significant	Material

Current Controls Mitigating Inherent Risk:

- Travel Assist Contingency Programme Board put in place to progress immediate required activity and to plan longer term development.
- Schools Transport Policy in place.

Sources of Assurance on Effectiveness of Identified Controls:

- Oversight from legal and finance as part of the Programme Board
- Services have been run by administrators and have seen an improvement in performance.
- Currently working positively with TfWM and administrators to develop the next stages.
- An SCN is being drafted setting out the recommended approach to secure on going provision.
- The Transitional Support Service Agreement runs until the end of May with the need to either secure services by June or look to extend the agreement.

No.	Actions to Reduce Risk to Target	Owner	Target Date	Progress	RAG
1	Discussions with alternative providers and routes re-allocated (where possible)	Improvement Consultant – Education and Skills	Completed	This is complete and now needs to be closed. Received positive responses to discussions between future providers and TfWM with 3 formal bid received by administrators for purchase of ATG Previous update April: Work is actively being undertaken to find alternative provider(s) to take over the affected routes. 11 routes of routes have already been redirected from ATGCSL to alternative providers and a further 4 on 1st April 2019 . Under the TTSA the Council upon a weeks' notice can remove routes from the scope of the services	Green

Safeguarding / Welfare					
Risk No: 42	**Risk Title:** Travel Assist				
				This is complete and now needs to be closed	
2	Review of providers contractual arrangements being carried out including quality assurance, safeguarding and governance compliance	Improvement Consultant – Education and Skills	July 2019	Work continues on commissioning led quality assurance Review and internal audit report completed. Improvement Plan in place. Good progress is being made against the Improvement Plan	Green
Updated by:	E&S Risk Rep	Date:	24/10/19		

Safeguarding / Welfare		
Risk No: 43	**Risk Title:** Early Years Health and Well Being contract	
Risk Description: •There are risks that the assumed financial savings from the contract will not be fully realised due to unforeseen costs and possible grant claw backs. Previous unforeseen costs have been identified in relation to estates and staffing issues •There are also wider risks relating to the construction of the contract itself and the lack of robust contract management arrangements. •All risks have been increased due to a lack of permanent commissioning and contract management arrangements		
Risk Owner: Director, Education and Skills	**Risk Lead:** Lead: Assistant Director Commissioning , Education and Skills	**Risk Type / Category:** Financial

Safeguarding / Welfare

Risk No: 43	Risk Title: Early Years Health and Well Being contract

Inherent / Gross Risk			Residual / Current Risk			Target Risk		
Likelihood	Impact	Prioritisation	Likelihood	Impact	Prioritisation	Likelihood	Impact	Prioritisation
High	High	Severe	High	Significant	Severe	Significant	Medium	Material

Current Controls Mitigating Inherent Risk:

- A newly established Children's and Young People's Commissioning Board which has cross directorate senior representation;
- A Monthly EYHWB Programme Board was established and due diligence undertaken. Officers report formally about progress against the key actions required;
- Discrepancies in the Estates Schedule are being jointly revised to ensure the correct buildings are in use or where appropriate changes made to correct these, following the process set out in the Change Control Schedule;
- There are formal Contract management arrangements in place through the recently established Intelligent Client Function (ICF) commissioning team in the Education and Skills directorate;
- Monthly employee reports are being shared by HRBP to each of the sub-contractors to capture staffing data including resignations, changes to hours, moves, maternity, LTS, etc.;

Sources of Assurance on Effectiveness of Identified Controls:

- Contract Governance mechanism in place that incorporates a Monthly Contract Management Review to hold BCHCT to account for contract performance against the metrics;
- A review of contract is underway with specific focus on performance measurement, estates, finance, employment and service specifications to be complete by end of March 2019;
- Position regarding designations agreed with DfE.

No.	Actions to Reduce Risk to Target	Owner	Target Date	Progress	RAG
1	- A review of contract is underway with a specific focus on performance measurement, estates, finance, employment and service specifications to be complete by end of	Improvement Consultant – Education and Skills	July 2019	On going discussion with BCHCT around contractual issues and performance This is now complete	Green

Safeguarding / Welfare					
Risk No: 43	**Risk Title:** Early Years Health and Well Being contract				
	March 2019.				
2	- Finalising options for the transfer of staff post the end of the secondment agreement	Improvement Consultant – Education and Skills	September 2019	TUPE consultation process now underway and actions are on track. September Cabinet approved the recommendations regarding transfer of staff at the end of the secondment period. This decision has now been cleared for implementation following the end of the call-in period. Discussions are continuing with the involvement of Legal, HR and BCHCT	**Amber**
Updated BY:	E&S Risk Rep	Date:	24/10/19		

Statutory Responsibilities / Compliance with Statutory Responsibilities	
Risk No: 1	**Risk Title:** Management of Equal Pay Claims

Risk Description:

Since 2006, a significant number of equal pay claims have been brought against the Council. The predominance of these claims relates to liability for the period before the implementation of Single Status, which took place in 2008, and liability for the period following the implementation of Single Status. The time limit for issuing these types of claims has now expired – in 2014 for the former; in 2017 for the latter.

The Council has also received claims for the period following the implementation of the Birmingham Contract (in November 2011); some with limited particularisation.

The past industrial action in Waste Management (July to November 2017) has increased the profile of equal pay. There remain considerable unknowns as to how many further claims might be brought and what risk or level of liability these claims might attract. A law firm acting for approximately 1,000 employees and formers employees on a “no win no fee” basis is pursuing its claims in the Tribunal, having rejected the Council’s settlement proposals. This firm has further particularised its claims, and the Council is currently in the process of

Statutory Responsibilities / Compliance with Statutory Responsibilities								
Risk No: 1	**Risk Title:** Management of Equal Pay Claims							
preparing its response/defence. Employees have been raising complaints/grievances regarding their perceived right to a payment equivalent to those made to employees in Waste Management following the industrial dispute in March 2019. Their grievances having been rejected, some employees have referred their complaints to ACAS, though no claim has yet been issued in the Employment Tribunal. The Council's position is that the complaints which have been raised so far are not claims that would fall under equal pay law, since the payments in question do not constitute contractual pay and were made in settlement of legal proceedings.								
Risk Owner: Director of Finance	**Risk Lead: Head of Legal Services**		**Risk Type / Category: Financial**					
Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
High	**High**	Severe	**Significant**	**Medium**	Material	**Medium**	**Low**	Tolerable

Current Controls Mitigating Inherent Risk:	Sources of Assurance on Effectiveness of identified Controls:
Significant progress has been made in terms of defending equal pay claims, managing settlement negotiations and executing settlement schemes, where approved by the Council. The Council's overarching settlement strategy is based on the level of assessed risks in relation to the likely success of claims through the Tribunal/Court process and the availability of financial resources. The validity of all equal pay claims is constantly challenged by the Legal & Governance department. Each claim is subject to robust legal challenge before any offer to settle is made. A litigation strategy has been developed to address any risks arising from the grievances/complaints from employees seeking equivalent payments to those made to staff in Waste Management ("parity payments").	Management assurance – reporting to Equal Pay Executive Cabinet Sub-Group, Corporate Governance Group, Audit Committee, the District Auditor and Employment Governance Group/Steering Board

Statutory Responsibilities / Compliance with Statutory Responsibilities					
Risk No: 1	**Risk Title:** Management of Equal Pay Claims				
With a view to preventing any discriminatory working practices, a robust review of processes and checks and balances are undertaken to mitigate against/prevent further liability where evidence of potential risks is known/identified.					
No.	**Actions to Reduce Risk to Target**	**Owner**	**Date**	**Progress**	**RAG**
1	Defend all low risk claims in the Tribunal and County Court	Equal Pay (EP) team	31/3/20	89% of claims for the period prior to the implementation of the Birmingham Contract have now been resolved; and 83% of claims for the period after the implementation of the Birmingham Contract have now been resolved.	**Green**
2	Undertake settlement negotiations with employees, or their representatives or unions, with potentially meritorious claims	EP team	31/3/20	An offer has been made to unions to settle their members' prospective claims for the period after the implementation of the Birmingham Contract. A framework agreement is to be drafted once that offer has been accepted formally. Negotiations with individual claimants and representatives with a relatively low number of claims are ongoing.	**Amber**
3	Execute outstanding settlement schemes	EP team	31/3/20	89% of claims for the period prior to the implementation of the Birmingham Contract have now been resolved; and 83% of claims for the period after the implementation of the Birmingham Contract have now been resolved.	**Amber**
4	Defend live litigation in the Tribunal	EP team	31/3/20	The Council has put its settlement proposals back on the table. Individual offers are in the process of being calculated and will made to the claimants in due course.	**Red**
5	Implement litigation strategy for "pay parity" complaints	EP team	31/3/20	875 grievances/complaints have been received by the Council, all of which have been responded to and rejected. Approximately 80 employees have referred their complaints to ACAS, who have	**Green**

Statutory Responsibilities / Compliance with Statutory Responsibilities					
Risk No: 1	**Risk Title:** Management of Equal Pay Claims				
				issued early conciliation certificates. To date, no claim has been brought to the Tribunal	
6	Monitor working practices in Waste Management so as to identify and address any further equal pay risks	Employment Gov Group (EGG)	31/3/20	The Employment team is working closely with Waste Management and will, as part of that ongoing relationship, monitor working practices.	**Amber**
7	Develop and maintain risk register to identify any practices in the organisation which could pose an equal pay risk	EGG	31/3/20	This action will continue in perpetuity.	**Amber**
8	Dismissal and re-engagement to end any ongoing equal pay liability	EGG	31/3/20	A team with the remit of identifying and addressing any non-standard arrangements and practices within the organisation is being set up, so as to ensure staff are not re-engaged on terms which perpetuate any current risks of further equal pay liability.	**Red**
Updated By:	Principal Legal Assistant	Date:	28/10/2019		

Statutory Responsibilities / Compliance with Statutory Responsibilities		
Risk No: 26	Risk Title: Failure to comply with all of the requirements of the Prevent Duty as specified within the Counter Terrorism and Security Act (2015.)	
Risk Description: The threat and vulnerability risk assessment of a terrorist attack in the UK places Birmingham as the most vulnerable city after London. In 2015 the Council and partners reviewed its infrastructure around this risk to take into account the Counter-Terrorism and Security Act 2015, that includes a duty on certain bodies (‘specified authorities’ listed in Schedule 6 to the Act), in the exercise of their functions to have ‘due regard to the need to prevent people from being drawn into terrorism’. The duty does not confer new functions on any specified authority. The term ‘due regard’ means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions.		
Risk Owner: Assistant Chief Executive	**Risk Lead: Prevent Manager**	**Risk Type / Category: Legislative / Regulatory**

Statutory Responsibilities / Compliance with Statutory Responsibilities

Risk No: 26	Risk Title: Failure to comply with all of the requirements of the Prevent Duty as specified within the Counter Terrorism and Security Act (2015.)							
Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
High	**High**	**Severe**	**High**	**High**	**Severe**	**High**	**High**	**Severe**

Current Controls Mitigating Inherent Risk:

- The Council has applied a partnership and mainstreaming approach to mitigate the risks associated with the threat.
- Governance for the Prevent programme has been strengthened with the Prevent coordinator now reporting directly to Assistant Chief Executive increasing visibility across the Council.
- Security briefings to Council House staff & Members.
- Training for front line staff moved to a 'train the trainer' model - 600 trainers having been trained to deliver future WRAP awareness training to schools alleviating capacity issues within the local authority. The Council has also developed a Prevent Awareness course e-learning package that will be ready for Q3 in 2019.
- Support continues to be provided to schools around Prevent and Prevent is embedded within the Children's Trust and CASS/MASH arrangements
- CHANNEL is in place as a multi-agency pre-criminal space platform to support vulnerable people
- Risk workshop carried out June 2019 to review current risk position

Sources of Assurance on Effectiveness of Identified Controls:

The Home Office Peer review of Birmingham City Council's Prevent responsibilities highly commended the work Birmingham is doing.

Birmingham has been identified as an area the Home Office would like the newly appointed reviewer of Prevent to visit.

Home Office receive regular monitoring reports on a quarterly basis.

Contest Board and Prevent Executive Board receive regular performance reports, to include referral data.

No.	Actions to Reduce Risk to Target	Owner	Target Date	Progress	RAG
1	To continue with the suite of controls	Prevent Manager	End of Q4	Ongoing.	Amber
2	The Council to develop a Prevent Awareness course e-learning package	Prevent Manager	Q3 in 2019.	Under Construction	Amber
Updated By: Prevent Manager		Date: 25/10/19			

Statutory Responsibilities / Compliance with Statutory Responsibilities

Risk No: 31	**Risk Title:** Increased pressure on the statutory homeless service

Risk Description: Increased pressure on the statutory homeless service in regards to volume of customers, which leads to significant financial pressure on the general fund due to increased use of B&B.

Risk Owner: Director	**Risk Lead: Service Director**	**Risk Type / Category: Financial**

Inherent / Gross Risk			Residual / Current Risk			Target Risk		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
High	**Significant**	Severe	**Significant**	**Medium**	Material	**Medium**	**Significant**	Material

Current Controls Mitigating Inherent Risk:

New Homeless Reduction Act Legislation implemented from April 2018.

The opening of two additional homeless centres in April 2019 as part of the Council's statutory duty to provide temporary accommodation has been completed. Residents are now occupying the centres. (Barry Jackson Tower and Magnolia House. Bed and breakfast has more than halved since May 2018.

The homeless prevention strategy is now approved by Cabinet which aims to prevent people becoming homeless and assisting in sustaining tenancies.

A domestic abuse hub, operated in partnership with BSWAID was initially piloted from 4 February 2019 and became fully operational from Monday 11 March 2019. It provides a support to those experiencing and fleeing domestic violence.

Sources of Assurance on Effectiveness of Identified Controls:

This risk is being closely monitored by Directorate Management Team and Cabinet Member for Homes and Neighbourhoods. There is a programme of regular Cabinet Member briefings dedicated to homelessness tracking and a standard dashboard has been developed to aid close monitoring and scrutiny.

A comprehensive re-design programme is underway and a number of key work streams are in place to address this risk. These incorporate improvements to homeless prevention work and a plan to address temporary accommodations and bed and breakfast numbers. A re-design project board has been established and an ambitious programme plan. The intended outcomes include ensuring the service is designed and managed fit for purpose and the correct resources are in place.

Delivery of the programme to reduce this pressure is monitored by Directorate Management Team and Cabinet Member for Homes and Neighbourhoods. There is a

Statutory Responsibilities / Compliance with Statutory Responsibilities

Risk No: 31	**Risk Title:** Increased pressure on the statutory homeless service
A dispersed void project was completed in December 2018 which created an additional 750 self-contained temporary accommodation units.	programme of regular Cabinet Member briefings dedicated to homelessness tracking and a standard dashboard has been developed to aid close monitoring and scrutiny. Birmingham Audit has commenced a review of the Temporary Accommodation Service. Monthly finance monitoring meetings to ensure effective management of actual and forecast income and expenditure.

No.	Actions to Reduce Risk to Target	Owner	Date (Target)	Progress	RAG
1	There is close monitoring of the delivery of the budget and additional governance arrangements have been introduced.	Service Director/Service Integration Head - Homelessness	March 2020	Monthly finance monitoring meetings to ensure effective management of actual and forecast income and expenditure.	Amber
2	Open a Homeless Prevention Hub in June 2019.	Housing Trailbazer Lead	June 2019	£400,000 of commissioned services has been identified and mobilisation in progress, the Ladywood hub opens on Monday 17th June 2019 for staff training. It will be operational from Monday 24th June 2019. 32 households have been at the hub. The issues presented by the customers included housing, family support, financial and mental health. Each of the households who attended the hub was provided with support to help them resolve their specific housing need. The average appointment period is 2 hours. The pilot will be reviewed at the end September 2019.	Amber

Statutory Responsibilities / Compliance with Statutory Responsibilities					
Risk No: 31	**Risk Title:** Increased pressure on the statutory homeless service				
				The pilot has created a learning environment to enable understanding of what 'pull on' support is required. The hub is currently working with NAIS, Registration, and Rents Team. Going forward we seeking to include partners external to the council to ensure continuing support can be provided at a more local level. Further into the pilot need to look at how this model can be implemented as business as usual. The pilot activity increased to 6 officers week commencing 14 October 2019 and additional prevention appointments are being offered. The outcome of this model will be evaluated in December 2019 and inform mobilisation.	
3	Private Rented Sector Access Fund	Housing Trailbazer Lead / Service Manager	Sept. 2019	We will be emulating the private rented sector secure sustain model in the prevention hub and TA pilots. We will be identifying private landlords to work with moving forward and discharging duty into the private rented sector from September 2019. The pilot has achieved 24 PRS lettings to date. The PRS access scheme and Help2rent social housing platform is being presented at the Annual Landlord Conference on 18 October 2019. The Help2rent SLA is being checked by procurement and legal services and the platform is expected to be launched in December 2019.	**Green**
4	New emergency homeless placement model	Service Manager Homeless & Pre-Tenancy / Housing Trailbazer	Sept. 2019	New Homeless Centre and TA step down accommodation model is being piloted at Barry Jackson Tower. This pilot is looking at improving support for homeless on the day cases needing TA, the pilot started on the 13th June 2019. An evaluation and will be evaluated over the forth coming weeks and the model is looking to ensure flow through the system where support is provided at the point of access and intensive until step down is possible. This will target resources in the right place and ensure maximum impact for customer.	**Amber**

Statutory Responsibilities / Compliance with Statutory Responsibilities					
Risk No: 31	**Risk Title:** Increased pressure on the statutory homeless service				
		Lead			
5	Review of spending/commissioned provision	Housing Trailbazer Lead	April 2020	Mapping of current commissioned provision and an analysis of homeless households support needs have commenced. The FHSG element has been evaluated and transferred to Housing Strategy and we now have an understanding of the resource use and delivery. This element is being reviewed to ensure we make best use of resources at contract end. Work is ongoing to understand the totality of resources available for prevention and we are developing these as part of the prevention hub and TA move on model.	**Amber**
6	Commissioning of a new universal prevention model is in progress by the CCoE . The procurement is for local delivery of a Housing and Wellbeing Centre's as part of the Vulnerable Adults Housing and Wellbeing Support Service. The commissioning model does seek to establish specialist advice and welfare centres for young people, domestic abuse, single adults and offenders upon prison release. The objective is to provide early intervention to prevent homelessness. There will be an opportunity to co-locate statutory homeless personnel into the new Health and Wellbeing Hubs. This approach embeds early and personalised support and prevention, to reduce the impact of more costly crisis stage interventions which are	Service Lead CCoE / Service Integration Head – Homelessness / Service Manager	1 Dec 2019	The procurement process is in flight with tenders received and evaluations currently being completed. Upon approval and notification of the new commissioned partners, co-location and lessons learned from the Homeless Prevention Hub can be explored and mobilisation planned. The transition plan with the Rough Sleeping Outreach service, Domestic Abuse Hub and Youth Hub is being developed. Additional HRA funding is being identified to add a contract variation to include HRA activities.	**Amber**

Statutory Responsibilities / Compliance with Statutory Responsibilities					
Risk No: 31	**Risk Title:** Increased pressure on the statutory homeless service				
	based upon statutory thresholds or definitions.				
7.	Increase supply of suitable temporary accommodation and eradicate the use of bed and breakfast.	Service Manager Homeless & Pre-Tenancy	March 2020	Additional temporary accommodation, for dispersed and homeless centre units, are being explored including: 1. Oscott Gardens, Perry Barr; 2. Oldfield Road, Balsall Heath 3. Bescot Court, Perry Barr 4. Belgrave Middleway, Edgbaston 5. Clearance Properties 6. Void BCC general need properties A Capital Funding Bid is in the process of being drafted for £15 million.	**Amber**
Updated BY:	Service Integration Head – Homelessness	Date:	28/10/2019		

Statutory Responsibilities / Compliance with Statutory Responsibilities		
Risk No: 34	**Risk Title:** Air Quality	
Risk Description: Failure to deliver a Clean Air Zone as mandated by Government by the target date of January 2020. Failure to do so could result in ongoing fines for not complyiing with air quality standards. related to Birmingham not meeting air quality compliance.		
Risk Owner: Director Inclusive Growth	**Risk Lead: AD Inclusive Growth**	**Risk Type / Category: Legislative / Regulatory**
Inherent / Gross Risk	**Residual / Current Risk**	**Target Risk**

Statutory Responsibilities / Compliance with Statutory Responsibilities

Risk No: 34	Risk Title: Air Quality							
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
High	**High**	Severe	**High**	**Medium**	Material	**Medium**	**Low**	Tolerable

Current Controls Mitigating Inherent Risk:

The Council has been issued with ministerial directions under the Environment Act (1995) to complete key milestones to be compliant for roadside NO_2 by 2021

This Business Case fully complies with the Ministerial Direction, with the required Charging Order approved by Cabinet- but yet to be approved by Government. Government have indicated a number of delays in their CAZ IT framework, which subsequently will impact on the CAZ start date, now anticipated to be July 2020 These headline mitigations are supported by: -

- Weekly teleconference meetings with DEFRA's Joint Air Quality Unit to update mitigation plans.
- SRO meetings with DERA/JAQU.
- Development of overarching clean air policy for Birmingham for 2019.
- Ongoing joint development work and positive engagement with WMCA.

Key progress comprises the completion of a Preferred Clean Air Zone Option Business Case and Cabinet report approval and Government approval, as required by the Ministerial Direction. The report follows the largest ever response of circa 11,000 to the CAZ consultation.

Sources of Assurance on Effectiveness of Identified Controls:

Wider Air Quality Plan that includes:

- Traffic management, signalling and signage controls - 12/2018.
- Controlled Parking Zones - 12/2018.
- BCC Internal & External Fleet transition to low / zero emission full Low / zero re-fuelling infrastructure - 04/2020.
- Clean Air Zone strategic business case signed off by Secretary of State by 12/ 2018 to enable CAZ infrastructure for access restrictions deployed by 04/2019.
- Revised Birmingham Taxi Licensing Policy based on air quality compliance emissions - 12/ 2019
- All BCC procurement frameworks and tendering processes aligned with CAZ compliance - 12/ 2019.

Statutory Responsibilities / Compliance with Statutory Responsibilities					
Risk No: 34	**Risk Title:** Air Quality				
The Charging Order that legally authorises the Council to implement a CAZ charging scheme (and the level of exemptions to be applied) was approved by Cabinet in June 2019.					
No.	**Actions to Reduce Risk to Target**	**Owner**	**Target Date**	**Progress**	**RAG**
1	CAZ implementation of cameras and programmed support measures will still commence as planned ahead of revised July 2020 start date.	SRO-Assistant Director for Transport & Connectivity.	04/2020	Contractual issues with contractors. Dialogue ongoing to resolve. Alternative approach to procurement of build contractors in place. Due to complete in November. Rollout of cameras and signage to start shortly after. End date for rollout updated accordingly.	Choose an item.
2	Development of mitigation support measures to support transition to compliant, low/zero emission vehicles for businesses, CAZ workers and residents.	Head of Clean Air Zone (CAZ)	01/2020	Approach to governance in terms of delegated authorities confirmed with Legal, Finance and Procurement reps. Taxi schemes and mobility credit schemes scheduled for review by cabinet in December 2019. Scrappage scheme and taxi rental scheme expected to be complete in early 2020. Approach in line with approvals from cabinet report in December 2018	Choose an item.
3	Development of back office systems and processes to support application process for exemptions and mitigations	Head of Caz	01/2020	First round of UAT testing with exemption system complete. Final round of UAT with CAZ team scheduled for November 2019. Development of system to support applications for mitigations underway and due to be completed in January 2020	
Updated By: IGRisk Rep		Date: 24/10/2019			

Statutory Responsibilities / Compliance with Statutory Responsibilities

Risk No: 12	Risk Title: Failure to comply with all the requirements of the Equality Act 2012 and the Public Sector Equality Duty.

Risk Description: Core/Gross Risks

1. Failure to comply with the Equality Act (2010) – High likelihood, High risk
2. Capacity to delivery community cohesion strategy and cabinet member expectations – H likelihood, H risk
3. Capacity and resource to support response to incidents & community issues – H likelihood, H risk
4. Lack of skills and knowledge across the business on cohesion and equalities – H likelihood, H risk
5. Failure to consider equality and cohesion in context of consultation leading to judicial review – H likelihood, H risk
6. Failure to consider impact of council budget savings on protected characteristics as defined in Equality Act 2010 leading to judicial review– H likelihood, H risk
7. Reputational damage H likelihood.

Risk Owner: Director of Public Health	**Risk Lead:** Partnership Manager	**Risk Type / Category:** Legislative / Regulatory

Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
High	**High**	Severe	**Medium**	**Significant**	**Material**	**Low**	**Medium**	**Tolerable**

Current Controls Mitigating Inherent Risk:	**Sources of Assurance on Effectiveness of Identified Controls:**
Draft equality objectives approved by CMT in July 2019 and currently consulting with legal on whether public consultation needed. CMT & ELT diversity champions appointed and provide quarterly updates on the protected characteristics of equality.	CMT minutes, Sharepoint

No.	**Actions to Reduce Risk to Target**	**Owner**	**Target Date**	**Progress**	**RAG**
1	a. Refresh of corporate equality objectives in 2019. b. CMT & ELT champions for diversity and inclusion appointed in May 2019. c. Working with Cabinet member to develop 'star chamber' type review of equalities work within	Partnership Manager	December 2019	Draft equality objectives have been approved by CMT and Cabinet Member for public consultation. Internal and public consultation will run until 28th October. Consultation findings will shape a Council-wide action plan in December 2019. CMT & ELT champions appointed and quarterly updates on actions and progress through ELT.	Amber

Statutory Responsibilities / Compliance with Statutory Responsibilities					
Risk No: 12	Risk Title: Failure to comply with all the requirements of the Equality Act 2012 and the Public Sector Equality Duty.				
	directorates.			Draft TOR agreed with Cabinet member and now starting process through CMT and EMT.	
2	a. Service review proposal to expand Equalities and Cohesion team being developed.	Director of Public Heath	September 2019	Draft service review proposal developed and working with Jonathan Tew and HR on taking forward. Proposals have been approved in principle and will be presented to EMT	Amber
3	a. Service review proposal to establish a specific incident response capacity.	Director of Public Heath	September 2019	Draft service review proposal developed and working with Jonathan Tew and HR on taking forward.	**Amber**
4	a. Improve understanding of protected characteristics through Public Health and Equalities & Cohesion team working together on developing core briefings to improve quality of Equality Impact Assessments b. EIA training programme rolled out across BCC to senior and middle managers. c. Member equalities training programme.	Director of Public Heath	October 2019	Briefings have been commissioned from the core reports and are expected in Autumn 2019. The EIA training is being continually reviewed and developed based on feedback from users. There is further work needed to map the core staff who need the training to ensure full coverage. The member equality training is in train and two sessions have been held. EIA Toolkit to be updated to make it more user friendly. Equalities lead officer integral part of the budget planning process. Providing Advice and guidance on cumulative Equalities impact.	**Amber**
Updated By: Partnership Manager		Date: 25/10/2019			

Statutory Responsibilities / Compliance with Statutory Responsibilities	
Risk No: 25	**Risk Title:** DoLS (Deprivation of Liberty Safeguards)
Risk Description: Failure to comply with statutory timescales in relation to DoLS (Deprivation of Liberty) referrals, which could lead to legal challenge and result in financial loss to the	

Statutory Responsibilities / Compliance with Statutory Responsibilities

Risk No: 25	Risk Title: DoLS (Deprivation of Liberty Safeguards)

Council.

Risk Owner: AD Community and Operations, Adult Social Care	Risk Lead: Head of Adult Safeguarding, Adult Social Care	Risk Type / Category: Legislative / Regulatory

Inherent / Gross Risk			Residual / Current Risk			Target Risk		
Likelihood	Impact	Prioritisation	Likelihood	Impact	Prioritisation	Likelihood	Impact	Prioritisation
High	Significant	Severe	Medium	Significant	Material	Medium	Significant	Material

Current Controls Mitigating Inherent Risk:
Refer Actions 1-3 below

Sources of Assurance on Effectiveness of Identified Controls:
A monthly position report is presented to the Directorate DOLS Project Board. A bi-monthly report is presented to the Cabinet Member.

No.	Actions to Reduce Risk to Target	Owner	Target Date	Progress	RAG
1	A monthly position report is presented to the Directorate DOLS Project Board. When governmnent proposals for how the transition to LPS are known, a brief will be prepared to the cabinet member based upon an agreed strategy	Head of Adult Safeguarding, Adult Social Care	Ongoing	Ongoing action	Green
2	1) **DOLS in Care Homes and Hospitals -** DOLS strategy was reviewed in July. ASCMT and the Cabinet Member subsequently adopted the recommendation to adopt an alternative view of the balance of litigation risks v financial risks in this area. In line	Head of Adult Safeguarding, Adult Social Care	Review end September 2019	The situation described at 1) above altered due to the number of DOLS referrals continuing to rise (up by 35% rise in the year to August 2018). As a consequence a back log of high priority cases began to develop. The position is to be monitored to understand if the position can be managed within existing resources. A backlog of high priority cases could increase the likelihood of a challenge, but it is not clear that this would alter the position to the extent that a challenge could be described as	Amber

Statutory Responsibilities / Compliance with Statutory Responsibilities					
Risk No: 25	**Risk Title:** DoLS (Deprivation of Liberty Safeguards)				
	with the approach taken by the majority of West Midland Local Authorities, it will in future only undertake DOLS assessments for those adults who meet the ADASS "High" criteria. The significantly enlarged Best Interest Assessor (BIA) team, with increased management and administrative support will remain but expenditure on the external BIA service has ceased. The effect is anticipated to be a reduction in the number of DOLS authorisations, but an increase of those of "High" priority (and existing cases due for renewal) being completed within the legal time limit. The overall position of the number of cases which have not been assessed will steadily increase, but this will be viewed as a lower risk to the Council than previously.			highly likely.	
3	**2) Community DOLS -** A business process, staff procedure, manager prioritisation guidance and staff training have been established, in conjunction with legal Services, and are now in use. This level of activity seems to be in line with that of	Head of Adult Safeguarding , Adult Social Care	Review end September 2019	Ongoing monitoring	**Green**

Statutory Responsibilities / Compliance with Statutory Responsibilities				
Risk No: 25	**Risk Title:** DoLS (Deprivation of Liberty Safeguards)			
	other local authority areas.			
Updated BY:	(Head of Adult Safeguarding, Adult Social Care) **,** (DASS)	Date:	17/10/2019	

Statutory Responsibilities / Compliance with Statutory Responsibilities								
Risk No: 11	**Risk Title: Loss of significant personal or other sensitive data**							
Risk Description: That the loss of significant personal or other sensitive data may put the City Council in breach of its statutory responsibilities and incur a fine of up to £20million from the Information Commissioner								
Risk Owner: CIO & Assistant Director (Interim) – Information , Technology & Digital Services (IT&D)			**Risk Lead:** : Senior Information (SIRO) and Director Digital and Customer Services			**Risk Type / Category: Legislative / Regulatory**		
Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
High	**High**	Severe	**Medium**	**Significant**	Material	**Low**	**Medium**	Tolerable
Current Controls Mitigating Inherent Risk: The Information Assurance Board (IAB), chaired by the Senior Information Risk Owner (SIRO) have agreed that the Council should achieve level 2 maturity to support the ongoing implementation of the Council's Information Assurance Framework. A plan of action is **in place with agreed targets and resource committed to complete this work.**						**Sources of Assurance on Effectiveness of Identified Controls:** Maintain clear lines of responsibility to the Senior Information Risk Owner (SIRO) and the Monitoring Officer. Security posture for the Council is monitored and has been recently reviewed as part of a SOCITM assessment as well as the LGA Stocktake. A secure email solution, Egress, has been deployed and is operational to prevent the		

Statutory Responsibilities / Compliance with Statutory Responsibilities					
Risk No: 11	**Risk Title: Loss of significant personal or other sensitive data**				
				accidental loss of data. Review Breach management processes to ensure any learning from breaches is adopted to prevent further data loss.	
No.	**Actions to Reduce Risk to Target**	**Owner**	**Target Date**	**Progress**	**RAG**
1	Across BCC, as well as capturing the data itself, we need to look at maintaining an inventory of the location of key personal data storage and the associated flows (including cross-border), with defined classes of personal data. We need to ensure that BCC is maintaining contracts and agreements with third-parties and affiliates consistent with the data privacy policy, legal requirements, and operational risk tolerance.	AD & CIO	31/12/19	A baselined Information Asset Register is now in place for all of the Neighbourhoods Directorate, parts of Digital & Customer Services (i.e. Customer Services only), and part of the Recruitment Processes for the HR directorate. These completed Information Asset Registers identify areas such as the location of key personal data storage and the associated flows (including cross-border) with defined classes of data. The Information Assurance Project is now addressing the 'Accountability Principle' and has identified Information Asset Owners (IAO's) within each directorate. IAO Training is currently being arranged and whilst doing so we are now working with each Information Asset Owner to establish their Information Asset Register for their respective Directorates. These Information Assert Registers will be kept in a Council wide repository and is due to be completed by the end of December 2019. In terms of maintaining contracts and agreements with third parties, the Information Assurance Project has commenced work on identifying our third parties that are in scope (i.e. whom BCC share personal and special category data with) and working with Procurement and legal to identify a programme of work which involves working with each party to ensure a Data Sharing/Processing Agreement has been sent and agreed with each third party in scope. These agreements will be kept in a Council wide repository.	Amber
2	BCC will need to maintain an information security program based on legal requirements and ongoing risk assessments. We will need to train our identified employees to be able to	AD/CIO	31/12/19	The Information Security requirements required by the GDPR being introduced are embedded into the Information Assurance Plan which is monitored by Project Board (monthly) and Information Assurance Board (Quarterly). The LGA Stocktake requirements together with the GDPR requirements are now being factored into the	Green

Statutory Responsibilities / Compliance with Statutory Responsibilities					
Risk No: 11	**Risk Title: Loss of significant personal or other sensitive data**				
	conduct a Data Protection Impact Assessment (DPIA) when managing change to personal data.			BEP Information Security programme. The requirement to carry out DPIA's has been fully incorporated into the IBR process for all IT Projects being carried out. All other change management processes together with DPIA's for 'non-IT Projects' within the Council are still required to fully incorporate the DPIA's into their governance processes. The Information Assurance Project is currently working on the steps required to embed this into a business as usual practice with each Information Asset Owner for each Directorate. 12 Business Analysts have now been trained on how to conduct a Data Protection Impact Assessments (DPIA) when managing change to personal data. A revised DPIA template has been produced to ensure all GDPR requirements are being met and has been signed off through the Project Board and Information Assurance Board.	
Updated By:	Business Excellence Manager	Date:	25/10/2019		

Statutory Responsibilities / Compliance with Statutory Responsibilities								
Risk No: 36	**Risk Title:** Response to Grenfell Tower enquiry							
Risk Description: Failure to respond positively and effectively to the required outcomes of the Grenfell Tower enquiry once known.								
Risk Owner: Director			**Risk Lead: Service Director**			**Risk Type / Category: Reputational**		
Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
Low	**Medium**	**Material**	**Low**	**Low**	**Tolerable**	**Low**	**Low**	**Tolerable**
Current Controls Mitigating Inherent Risk:				Sources of Assurance on Effectiveness of Identified Controls:				

Statutory Responsibilities / Compliance with Statutory Responsibilities

Risk No: 36	**Risk Title:** Response to Grenfell Tower enquiry
Delivery in responding to the outcomes of the Grenfell Tower reports are closely monitored by the Service Heads involved. Regular updates are provided at Housing DMT and escalated as required. Project plan produced for all programmes of works required to investigate cladding systems and any associated remedial works to further enhance existing fire safety measures. Fire safety campaign – completion April 2018 Fire awareness visits – completion autumn 2018 Awaiting further imminent regulations announcements from MHCLG following Hackitt recommendations. This risk is also recorded on the Neighbourhoods Directorate Risk Register and monitored through this process.	Where concerns are identified appropriate action is taken. Grenfell 2 years on report is going to Cabinet in July reporting on progress.

No.	Actions to Reduce Risk to Target	Owner	Date	Progress	RAG
1	Programme to fit Sprinkler systems to 213 high rise blocks over a 3 year period starting 1/4/18	Head of capital investment / Head of Service	2018 - 2021	Installation programme is underway and being monitored closely to ensure performance targets are met.	Green

Statutory Responsibilities / Compliance with Statutory Responsibilities					
Risk No: 36	**Risk Title:** Response to Grenfell Tower enquiry				
2	Programme to carry out fire risk assessments to all communal areas annually	Head of capital investment	From 2018 ongoing	These are in place to ensure all communal areas are inspected. Work is ongoing to consider all recommendations from the Building Safer Futures in relation to fire risk assessments	Green
Updated By:	Head of capital investment	Date:	28/10/19		

Statutory Responsibilities / Compliance with Statutory Responsibilities								
Risk No: 37	**Risk Title:** Homeless Reduction Act.							
Risk Description: Insufficient council resources to meet the requirements of the Act fully.								
Risk Owner: Director			**Risk Lead: Service Director**			**Risk Type / Category:** Legislative / Regulatory		
Inherent / Gross Risk			Residual / Current Risk			Target Risk		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
High	**High**	Severe	**Medium**	**High**	Severe	**Medium**	**Medium**	Material
Current Controls Mitigating Inherent Risk: New Homeless Reduction Act Legislation implemented from April 2018. New IT system developed with Councils IT providers and fully operational from July						Sources of Assurance on Effectiveness of Identified Controls: This risk is being closely monitored by Directorate Management Team and Cabinet Member for Homes and Neighbourhoods. There is a programme of regular Cabinet Member briefings dedicated to homelessness tracking and a standard dashboard has been developed to aid close		

Statutory Responsibilities / Compliance with Statutory Responsibilities					
Risk No: 37	**Risk Title:** Homeless Reduction Act.				
2019. The homeless prevention strategy is now approved by Cabinet which aims to prevent people becoming homeless and assisting in sustaining tenancies. A domestic abuse hub, operated in partnership with BSWAID was initially piloted from 4 February 2019 and became fully operational from Monday 11 March 2019. It provides a support to those experiencing and fleeing domestic violence. Monthly reviews are being carried out by the Ministry of Housing Communities and Local Government (MHCLG)				monitoring and scrutiny. A comprehensive re-design programme is underway and a number of key work streams are in place to address this risk. These incorporate improvements to homeless prevention work and backlog of homeless casework. A re-design project board has been established and an ambitious programme plan. The intended outcomes include ensuring the service is designed and managed fit for purpose and the correct resources are in place. Delivery of the programme to reduce this pressure is monitored by Directorate Management Team and Cabinet Member for Homes and Neighbourhoods. There is a programme of regular Cabinet Member briefings dedicated to homelessness tracking and a standard dashboard has been developed to aid close monitoring and scrutiny.	
No.	**Actions to Reduce Risk to Target**	**Owner**	**Date**	**Progress**	**RAG**
1	Redesign the Housing Option Service	Service Director	April 2019	Phase 1 completed.	Green
2	Phase 2 re-design of Housing Option Service	Service Director/ Head of Service Housing Options & PRS	January 2020	Informal consultation commenced April 2019. Formal consultation re-planned for March 2020 with implementation June/July 2020.	Amber
3.	Open a Homeless Prevention Hub in June 2019.	Housing Trailbazer Lead	June 2019	£400,000 of commissioned services has been identified and mobilisation in progress, the Ladywood hub opens on Monday 17th June 2019 for staff training. It will be operational from Monday 24th June 2019.	Amber

Statutory Responsibilities / Compliance with Statutory Responsibilities					
Risk No: 37	**Risk Title:** Homeless Reduction Act.				
				32 households have been at the hub. The issues presented by the customers included housing, family support, financial and mental health. Each of the households who attended the hub was provided with support to help them resolve their specific housing need. The average appointment period is 2 hours. The pilot will be reviewed at the end September 2019. The pilot has created a learning environment to enable understanding of what 'pull on' support is required. The hub is currently working with NAIS, Registration, and Rents Team. Going forward we seeking to include partners external to the council to ensure continuing support can be provided at a more local level. Further into the pilot need to look at how this model can be implemented as business as usual. The pilot activity increased to 6 officers week commencing 14 October 2019 and additional prevention appointments are being offered. The outcome of this model will be evaluated in December 2019 and inform mobilisation.	
4.	Recruit to Housing Options Centre vacancies	Service Manager	October 2019	Shortlisting in progress, June 2019. Some of the successful candidates are from within the service area, which has created vacancies. Will be working with DWP to create a bigger pool of prospective employees. All interviews have now taken place for the SHNO posts and conditional offer letters have been issued to the successful candidates. There have been 5 successful HNO candidates – x3 will be recruited to the HOC and x2 to the PRS. (There are a remaining 3 interviews which will take place on 05 November and one further candidate also pending).	**Amber**

Statutory Responsibilities / Compliance with Statutory Responsibilities					
Risk No: 37	**Risk Title:** Homeless Reduction Act.				
5.	Review of spending/commissioned provision	Housing Trailbazer Lead	June 2020	Mapping of current commissioned provision and an analysis of homeless households support needs have commenced. The FHSG element has been evaluated and transferred to Housing Strategy and we now have an understanding of the resource use and delivery. This element is being reviewed to ensure we make best use of resources at contract end. Work is ongoing to understand the totality of resources available for prevention and we are developing these as part of the prevention hub and TA move on model.	**Amber**
6.	Private Rented Sector Access Fund to be implemented to maximise "move on" opportunities to relieve homelessness	Service Manager	September 2019	We will be emulating the private rented sector secure sustain model in the prevention hub and TA pilots. We will be identifying private landlords to work with moving forward and discharging duty into the private rented sector from September 2019. The pilot has achieved 24 PRS lettings to date. The PRS access scheme and Help2rent social housing platform is being presented at the Annual Landlord Conference on 18 October 2019. The Help2rent SLA is being checked by procurement and legal services and the platform is expected to be launched in December 2019.	**Green**
7	Commissioning of a new universal prevention model is in progress by the CCoE . The procurement is for local delivery of a Housing and Wellbeing Centre's as part of the Vulnerable Adults Housing and Wellbeing Support Service. The commissioning model does seek to establish specialist advice and welfare centres for young	Service Lead CCoE	1 dec 19	The procurement process is in flight with tenders received and evaluations currently being completed. Upon Cabinet approval and notification of the new commissioned partners, co-location and lessons learned from the Homeless Prevention Hub can be explored and mobilisation planned. The transition plan with the Rough Sleeping Outreach service, Domestic Abuse Hub and Youth Hub is being developed. Additional HRA funding is being identified to add a contract variation to include HRA activities.	**Amber**

Statutory Responsibilities / Compliance with Statutory Responsibilities					
Risk No: 37	**Risk Title:** Homeless Reduction Act.				
	people, domestic abuse, single adults and offenders upon prison release. The objective is to provide early intervention to prevent homelessness. There will be an opportunity to co-locate statutory homeless personnel into the new Health and Wellbeing Hubs. This approach embeds early and personalised support and prevention, to reduce the impact of more costly crisis stage interventions which are based upon statutory thresholds or definitions.				
Updated By:	Service Integration Head – Homelessness	Date:	28/10/2019		

Statutory Responsibilities / Compliance with Statutory Responsibilities								
Risk No: 17	**Risk Title: Staff Harm by not sharing data effectively**							
Risk Description: Staff Harm by not sharing data effectively								
Risk Owner HR Director		**Risk Lead: H&S Lead**			**Risk Type / Category: Information**			
Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
Significant	**High**	Severe	**Medium**	**Medium**	Material	**Low**	**Low**	Tolerable
Current Controls Mitigating Inherent Risk:				**Sources of Assurance on Effectiveness of Identified Controls:**				

Statutory Responsibilities / Compliance with Statutory Responsibilities	
Risk No: 17	**Risk Title: Staff Harm by not sharing data effectively**
Joint report went to CLT (from customer services and HR) on 18th January 2018, explaining how this worked currently and what the issues were around funding the costs of accessing the register, including a suggestion we bring the budget together centrally so people don't feel they can't afford to do it. There were a number of discussions points and follow on actions from CLT, including that: 1) CLT approve the use of the Data Warehouse as a mandatory requirement to check risk markers prior to any visits being undertaken by BCC employees to both domestic properties and businesses 2) CLT will review the funding of the Data Warehouse as part of the Councils long term financial plan to ensure that the risks associated with failure to comply are minimised and that the data warehouse continues to be available for use across the council 3) CLT will identify the appropriate Director to be the named officer responsible for their risk marker solution (currently this is the director of HR but only as a temporary measure – may sit better in Revenues and Benefits) 4) CLT will require the safety manager to draft the appropriate guidelines for usage of the risk marker solution	Management assurance. Currently the data warehouse pulls in the risk markers from CRM, Housing, MAPSS and CareFirst. Any user of the warehouse that searches a relevant name or address will have the respective risk markers presented to them. The risk markers not only relate to health and safety but child / vulnerable adult safeguarding too. The Audit team are in the process of creating an Intelligence Network across the City for anyone who has an investigative, enforcement or regulatory element to their role; or are likely to have some contact with the public. However there remain challenges regarding balancing the need for timely access by a large number of staff and the requirement to ensure sufficient security of the sensitive data. Further work on this is required Council Tax, Business Rates and Rents have a risk marker on their respective systems; this risk marker is extracted and added to the data warehouse.

No.	Actions to Reduce Risk to Target	Owner	Target Date	Progress	RAG
1	During 2019 further work on effective access is required	TBD			Choose an item.
2	Monitoring the use of the IT system by Corporate Safety Services.	TBD			Choose an item.
3	Guidance for employees will be completed once surety of access for all required has been secured	TBD			Choose an item.

Statutory Responsibilities / Compliance with Statutory Responsibilities					
Risk No: 17	**Risk Title: Staff Harm by not sharing data effectively**				
4	Appropriate Line Managers to monitor employee safety, as applicable	TBC			Choose an item.
Updated By:	Risk is being re drafted including risk name and stakeholders	Date:	June 2019 No further updates		

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC								
Risk No: 29	**Risk Title: Budget Management**							
Risk Description: Not developing sufficiently robust plans to support setting a balanced budget (including in the medium term), and not containing net spending within the approved budget.								
Risk Owner: Director of Finance		**Risk Lead: Director of Finance**			**Risk Type / Category: Financial**			
Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
High	**High**	Severe	**Medium**	**High**	Severe	**Medium**	**Low**	Tolerable
Current Controls Mitigating Inherent Risk: Delivery of the 2019/20 budget including management of financial pressures and delivery of the approved savings programme is being closely monitored and managed, corporate directors in collaboration with their Finance Business Partners. Further support is provided by the Programme Management Office with focus upon providing assurance in relation to the implementation of savings plans.					**Sources of Assurance on Effectiveness of identified Controls:** Resources O&S scrutinises budget matters on an ongoing basis and identifies areas of concern as appropriate. Where concerns are identified relevant service scrutiny committees will assess the impact on specific service areas including impact upon services of in-year mitigations.			

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC

Risk No: 29	Risk Title: Budget Management

There will be scrutiny and challenge of the financial position on a monthly basis via the Council's Management Team, Member led Star Chambers, EMT and Resources Overview & Scrutiny.

On a quarterly basis and there will be further rigorous challenge of the overall financial performance via the officer Budget Programme Board chaired by the Chief Executive and supported by the Budget Planning Group. Quarterly reports will be considered by Cabinet. Additional Member led star chambers have been established for those directorates are forecasting significant overspends to explore the issues and develop solutions. This will continue throughout the year until the budgetary position is successfully recovered.

Directors have clear accountability for the delivery of savings in their directorates and this includes attendance at monthly meetings with the Cabinet Member for Finance.

The Council's LTFP is refreshed regularly to take account of latest information, including the successful mitigation of finanical pressures and delivery of savings plans. A periodic assessment of the impact of in year delivery upon future finanical years in undertaken to ensure proactive management.

No.	Actions to Reduce Risk to Target	Owner	Target Date	Progress	RAG
1	There is close monitoring of the delivery of the Budget and additional governance arrangements have been introduced	Director of Finance / Assistant Director	April 19	The CMT is building on the stabalisation of the financial position achieved with a £5.6m underspend for 2018/19. The following arrangements are in place for 2019/20: - Collaborative support, review and challenge of savings delivery and management of budgetary pressures by Finance Business Partners and PMO working closely with Directorates	Green

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC					
Risk No: 29	**Risk Title: Budget Management**				
				- Monthly review and challenge by CMT, Member Led Star Chambers prior to consdieration by EMT, and Resources O&S - Quarterly review and challenge by CEO led Budget Programme Board supported by Budget Planning Group Focused deep dive of areas with significant overspends by Member Led Star Chambers to oversee development and delivery of directorate financial recovery plans.	
2	Moving to a more integrated planning and performance management approach.	Director of Finance/ Assistant Chief Executive	Mar 19	**During 2019-20** a. In February 2019 the Council approved a balanced MTFS over the period 2019/20 2022/23 subject to significant uncertainty over the future local government finance framework that will not become clear until the Government's spending review in Autumn 2019. Therefore the Council will need to prepare for a range of financial scenarios that could see our resources vary between approx. £40m per annum reduction to £100m per annum increase dependent upon the Review by 2024. This may not become clear even in SR2019 as it is now expected that this will cover only 2020/21 and not a three year review as originally planned due to the delays in Brexit. We must plan for the worst to ensure we can responds to the national funding uncertainty. For 2020/21 we will plan for a reduction of £30m. b. Launch of 2020/21 budget process on 7 June at EMT and 20 June ELT set out the importance of moving to a business transformation and outcomes based budget cycle underpinned by a robust performance management framework to demonstrate improved Value for Money and financial resilience. We will twin track the development of savings to deliver in 2020/21 and 2021/22, whilst developing service transformation initiatives for the medium to longer	**Amber**

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC					
Risk No: 29	**Risk Title: Budget Management**				
				term. c. Following the refresh of the Council Plan by Cabinet in June 19, the Assistant Chief Executive is currently putting arrangements in place to introduce corporate business planning and performance management framework, building upon the foundations laid in 2018/19. These will be launched in July/August to be developed by directorates alongside their budget proposals and review of their medium term financial plans for approval in February. d. Delivery and monitoring – ongoing – Budget PMO established and will QA the implementation plans for budget proposals during the 2020/21 process. e. The Birmingham Independent Improvement Panel (BIIP) stepped down in March 2019, with the Council having completed and publicised a 2019 stock take report on future improvement areas. Since that point, the Council has continued to work with MHCLG regarding the Council's own improvement governance arrangements and proposals will be submitted for consideration to Cabinet in July. This new model will ensure that key areas of future improvement activity are progressed in concert with the delivery of the 2019-20 profiled savings and oversight of transformation activity for 2020-21 and 2021-22.	
3	Proposals will be subject to corporate public consultation commencing following Cabinet approval and more specific engagement and consultation also take place where appropriate	Director of Finance/ AD Partnerships / All CMT	Feb 20	Corporate Consultation on the 2019/20 Budget completed; further localised and targeted consultation is being developed. Directorate consultations will be required within the year for specific budget proposals. This will be monitored as part of 2019/20 budget monitoring and through PMO support in developing and challenging Implementation Plans. Corporate Communications are planning for a 12 week consultation – though this is	**Amber**

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC					
Risk No: 29	**Risk Title: Budget Management**				
				dependent on all budget savings being signed off and ready for public scrutiny by the required date. All Directorates will need to have plans for any service specific consultations that will be required as supplementary activity.	
Updated By:	F&G Risk Rep – No further updates have been provided.	Date:	21/8/19		

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC								
Risk No: 15	**Risk Title: Not recognising the need to divest of costly property assets in radical new solutions to reframe service delivery.**							
Risk Description: Risk of not recognising the need to divest of costly property assets in radical new solutions to reframe service delivery; driving out property for disposal, but beyond capital receipt generation, ultimately solutions should deliver innovative and appropriate reductions in future revenue operating costs.								
Risk Owner: Director Inclusive Growth	**Risk Lead: Head of Service**		**Risk Type / Category: Financial**					
Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
Significant	**Medium**	Material	**Medium**	**Medium**	Material	**Medium**	**Low**	Tolerable
Current Controls Mitigating Inherent Risk: **Still to be obtained**					**Sources of Assurance on Effectiveness of Identified Controls:** **Still to be obtained**			

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC					
No.	**Actions to Reduce Risk to Target**	**Owner**	**Target Date**	**Progress**	**RAG**
1	The approval by Cabinet in November 2018 of a new corporate Property Strategy with a key emphasis on the Operational Portfolio as one of four themes. Recommendations include reducing the level of directly managed stock in order to retain a smaller, multi-faceted, well-maintained estate	Head of Service	March 2019 July 2019	Ongoing and subject to potentially, significant change driven by BCC corporate business plan (this is currently "continuously changing in the short term").	**Amber**
2	The agreed budget proposals for FY 19/20 and emerging proposals for FY 20/21 The current rounds of budget proposals for FY19/20 onwards contain a number of property rationalisation propositions across the service areas as part of the contributions to future years cost reductions. This includes the Public Hubs Programme which will remodel and reduce the Council's frontline estate.	Head of Service	July 2019	Ongoing and subject to potentially, significant change driven by BCC corporate business plan (this is currently "continuously changing in the short term"). Progress on the Public Hub Programme was discussed at both CMT and EMT in June 2019, with further direction given. External subject matter expert with proven track record of delivering such programmes to be procured to assist in mapping out the options, formulating delivery plan and communication A "lessons learnt" event with other local authorities who have undertaken similar transformations is to be held on the 22nd October. The newly formed Public Hubs Board had its unaugural meeting on the 8th October with a new project plan adopted, working with the community library estate as an initial proof of concept. Property Services to work with Finance to review all proposals in the Budget Process 20/21 that may have an asset implication.	**Amber**

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC					
3	Through the recommendations of the Property Strategy services will need to articulate their medium term asset plans and associated utilisation / resourcing which in turn will be subject to critical appraisal by the Property & Assets Board. To assist with property rationalisation alongside future service planning and development programmes, a Property Services Business Partner role has been established with the Neighbourhoods Directorate.	Head of Service	May 2019	Ongoing and subject to potentially, significant change driven by BCC corporate business plan (this is currently "continuously changing in the short term"). As part of the 20/21 budget planning exercise a request has been made for funding for a renewed corporate programme of condition surveys / asbestos surveys / fire risk assessments, not only to ensure statutory compliance within the estate but also to articulate the current issues of the estate and provide a catalyst to decisions as to what level of building base is sustainable.	**Amber**
4	The Corporate Landlord service has continued to deliver the facilitation of delivery of further organisation changes e.g. Service Birmingham and the Contact Centre the creation of the Children's Trust, absorption of Service Birmingham / ICTDS and Contact Centre functions within the estate, accommodating the CWG project Team etc.	Head of Service	June 2019	Ongoing and subject to potentially, significant change driven by BCC corporate business plan (this is currently "continuously changing in the short term"). A briefing paper will be brought to CMT in September 2019 updated the senior officers on changes required / levels of agility needed to achieve the stated savings target of £2.4m External subject matter expert has been appointed to assist in mapping out the options and delivery plan to report in January 2019.	**Amber**
5	Continued development of the corporate property database (Techforge) - information and systems development continues to progress as planned and the additional functionality is being applied in	Head of Service	March 2019	Continued development of the corporate property database (Techforge) - information and systems development continues to progress as planned and the additional functionality is being applied in the management of repairs and maintenance costs, provision of information and analysis to inform strategic decision making, etc.	**Amber**

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC					
	the management of repairs and maintenance costs, provision of information and analysis to inform strategic decision making, etc. The "Modern Workplace" project is intended to increase agility and bring further organisation and management culture change across the Council. A key outcome will be further rationalisation of the Central Administration Buildings portfolio.	Head of Service	June 2019	The "Modern Workplace" project is intended to increase agility and bring further organisation and management culture change across the Council through improved ICT and revised HR policies. A key outcome will be the opportunity for increased agility and different ways of working, enabling further rationalisation of the Central Administration Buildings portfolio and this will form the basis of the above referenced briefing note to CMT in September 2019. HR, ICTDS AND Property Services will work closely and collaboratively to ensure such changes are implemented.	
Updated BY:	Head of Service Inclusive Growth	Date:	16/10/2019		

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC		
Risk No: 38	**Risk Title: To manage the Enterprise Zone Programme in line with its delivery plan.**	
Risk Description: Risk of under achieving: potential business rates income, economic growth, and outputs/achievements.		
Risk Owner Director Inclusive Growth	**Risk Lead: Inclusive Growth (Delivery) / Finance and Governance (Accountable Body)**	**Risk Type / Category: Reputational**
Inherent / Gross Risk	**Residual / Current Risk**	**Target Risk**

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC

Likelihood	Impact	Prioritisation	Likelihood	Impact	Prioritisation	Likelihood	Impact	Prioritisation
Medium	**High**	Severe	**Medium**	**Significant**	Material	**Medium**	**Significant**	Material

Current Controls Mitigating Inherent Risk:

- Financial principles are integrated in to the Enterprise Zone (EZ) Model, to inform and provide assurance that funding of projects is affordable prior to it being committed.
- Collaboration with Finance to manage the EZ Business model and ensure it contains the latest data on spend and business rates income.
- Collaboration with BCC Planning officers and business rates team to enable effective monitoring of development on EZ sites and their hereditaments to ensure the forecasts for business rates income are accurate and up to date.
- Collaboration with GBSLEP Programme Management Office (PMO) on quarterly reporting by EZ projects.
- Reporting to the Programme Delivery and GBSLEP Boards providing reports and requesting approval.
- Substantial proportion of business rates income is ring fenced on an annual basis to create a financial contingency as a safeguard against business rates income not coming forward as per forecast.

Sources of Assurance on Effectiveness of Identified Controls:

- All projects now follow the GBSLEP's assurance framework, thus the Treasury Green Book process for developing business cases for funding.
- The EZ and Curzon Delivery Board meets monthly (last meeting 18 July 2019) to implement the delivery of the EZ Investment Plan, and monitor and oversee the delivery of EZ and Curzon projects managed by the Economy Directorate.
- Major EZ projects are reported to BCC Capital Board.

No.	Actions to Reduce Risk to Target	Owner	Target Date	Progress	RAG
1	Develop EZ and Curzon projects to meet requirements as outlined in the Investment	EZ Programme	To cover 10 year	Management of Enterprise Zone Model Regular Monitoring of projects	Green

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC					
	Plan.	Manager	Investment Plan	Capital Board Business cases for funding meet HM Treasury's Green Book Standard.	
2	To monitor Enterprise Zone BCC managed projects (EZ and Curzon).	EZ Programme Manager	To cover 10 year Investment Plan	Management of Enterprise Zone Model Regular Monitoring of projects Capital Board EZ and Curzon Project Delivery Board meets regularly to discuss the management of the EZ Model. Regular monitoring of projects continues. Senior representation at the BCC Capital Board.	Green
3	To maintain state aid systems and monitor EZ business rates relief.	EZ Programme Manager	To cover 10 year Investment Plan	Management of Enterprise Zone Model Regular Monitoring of projects Capital Board Management of a EZ business rates relief system received by businesses located on eligible EZ sites. Regular Monitoring of the sums received by the businesses. Paper trail with businesses in receipt of EZ business rates relief.	Green
4	Collate BCC EZ and Curzon delivery programme outputs and outcomes.	EZ Programme Manager	To cover 10 year Investment Plan	Management of Enterprise Zone Model Regular Monitoring of projects Capital Board Management of Enterprise Zone Model activity. Regular monitoring of projects. Ongoing monitoring of those businesses received EZ business rates relief. Capture of activity on EZ sites. Following the monitoring and slippage of the One Chamberlain Square and Three Snow Hill development, overall forecast business rates income has reduced for 2019/2020 and	Green

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC					
				2020/2021. To address this the team reviewed the financial model to identify where activity / spend could be slipped and did so to cover the shortfall.	
Updated BY:	EZ Programme Manager	Date:	24/10/2019		

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC								
Risk No: 41	**Risk Title:** School Deficits							
Risk Description: •National funding arrangements have resulted in real term funding reductions which coupled with rising costs means that there is a risk that increasingly, schools are not able to run balanced budgets:- •There is the potential that some schools may build up deficits which cannot be cleared and which ultimately may need to be met by BCC •In addition there is a pressure on the high needs block which centrally supports places for children with SEND.								
Risk Owner: Director Education and Skills	**Risk Lead:** Assistant Director – Education and Early Years / Assistant Director SEND		**Risk Type / Category:** Financial					
Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC

Risk No: 41	Risk Title: School Deficits							
High	High	Severe	High	Significant	Severe	Medium	Significant	Material

Current Controls Mitigating Inherent Risk:

- Earlier use of financial warning notices where there are financial concerns. Intervention considered as appropriate inc. removal of cheque book facility to the removal of governing body and replacement with an Interim Executive Board
- Collaboration with Regional Schools Commissioner to ensure swift action taken to address school improvement requirements by identifying a Sponsor early to then maximise the impact of additional investment in school improvement.
- Schools financial monitoring procedures to be reinforced with requirement that these are reported to all Governors.
- Schools identified to be financially vulnerable, to have imposed level of spend agreed by BCC
- Schools Financial Services to work directly with vulnerable schools to establish a financial recovery plan
- School Causing Concern Pre-warning and then warning notices if there are no improvement in the financial management, to be sent to all schools with a forecasted deficit. (DfE regulations)

Sources of Assurance on Effectiveness of Identified Controls:

- Schools Financial Governance Group set up to co-ordinate support and challenge to schools.
- Initial Audit review carried out with findings being adopted and second review to be set up to include more detailed stress testing of schools ability to cope with further cuts in funding.
- More targeted audits of schools

No.	Actions to Reduce Risk to Target	Owner	Target Date	Progress	RAG
1	Strengthen Schools Finance Governance Board, by: •Corporate Director to chair	Director Education and Skills	April	A further report to CMT will be provided in October updating the August position on deficits and action taken and further actions proposed. Change of chair has been agreed and implemented. Terms of reference drafted and adopted. The June Finance Governance Board was chaired by the Director of	Green

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC					
Risk No: 41	**Risk Title:** School Deficits				
	•Review methodology and develop risk register •Quarterly strategic forecasting to determine financially vulnerable schools			Education and Skills. Follow up report with School Deficits Action Plan presented to CMT on 13 May	
2	Schools Forum to consider financial position of school budgets: •Identify a Schools Forum rep to join the Schools Finance Governance Board, •Agree criteria by which schools are identified as being financially vulnerable, •Receive reports and monitor the school budget position	Senior Business Analysist / Finance BP	June 2019	A draft Policy on the Clawback of Surplus Balances will be taken to the September School Forum meeting for consideration and approval. School Forum meeting took place in June and a request for representative to join the Board was made at the meeting and accepted in principle – name to be confirmed. A report was taken on the School Carried forward balances at the end of 2018/19, which included schools in deficit and a commitment agreed to bring quarterly reports on school deficit position to School Forum meetings.	Amber
3	Management of school deficits, by: - •Inadequate schools to be risk assessed to determine if Governing Body to either be replaced by an IEB or strengthened with an additional finance governor, •Meeting to be held with Head Teacher /Chair of Governors for any school facing	Senior Business Analysist / Finance BP/Director of Education & Skills	Sept 19	A further report on Schools Causing Financial Concerns has been produced for August 2019. This was discussed at the Finance and Governance Group (Schools in Financial Difficulty) on 17th September and will be presented to the School Forum September meeting and further actions agreed as appropriate. The report on Schools Causing Financial Concern has been produced for June 2019 and the actions outlined in this section will be progressed in line with the information and concerns within the report.	Green

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC					
Risk No: 41	**Risk Title:** School Deficits				
	potential removal of delegated powers and actions agreed •In exceptional circumstances the schools delegated powers to be removed.				
Updated BY:	E&S Risk Rep	Date:	24/10/19		

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC	
Risk No: 46	**Risk Title: Universal Credit**

- **Risk Description:** UC cases in rent arrears stands at £7.7m. This accounts for 50.33% of all rent arrears, which currently stands at £15.3m. It should be noted that £5.5m of the UC cases was pre existing arrears, therefore the remaining £2.2m are arrears accrued entirely as a result of UC and accounts for 14.4% of all rent arrears. Reduction in HB income of £25 million to the rent account projected for 2019/20
- Increase in rent arrears
- Decrease in tenancy sustainability
- Increase in evictions and homelessness
- Increase in citizens debt
- Increased council tax arrears
- Lower rates of debt recovery of housing benefit overpayments
- Lower take-up of council tax support
- Reduction in DWP funding adds pressure to budgets and remaining HB recipients
- Further short notice change announcements from DWP
- Multiple changes of implementation dates from DWP

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC								
• Confusion for citizens								
Risk Owner: Assistant Director, Revenues and Benefits			**Risk Lead:** Director, Digital and Customer Services			**Risk Type / Category: Financial**		
Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
Significant	**Significant**	Severe	**Medium**	**Medium**	Material	**Low**	**Low**	Tolerable

Current Controls Mitigating Inherent Risk:

- Pilot work continues underway to examine interventions in order to mitigate the impact on tenants and the HRA. This is being built into a forthcoming service redesign for the Rent Service.
- Alternative Payment Arrangements (APAs) are being encouraged so the Council receives the rent direct from UC payments where possible.
- Close working with DWP work coaches and other partners is helping to reduce the impact.
- Alternative ways of working have been explored with other housing providers – as well as software solutions.
- Housing Benefit recovery is being closely monitored and a recent initiative will increase recovery rates for people who are in work.
- New 50% earnings disregard in place and allowing increased rates of recovery on HB cases before more are 'lost' to UC
- Awareness around Council Tax Support claim process is being increased at regular strategic meetings between the Council and the DWP.
- Benefit Service is working on new arrangements for service delivery from 2019/20 in order to mitigate against DWP cuts and protect vulnerable tenants.

Sources of Assurance on Effectiveness of Identified Controls:

- Headline arrears figure for the first 25 weeks 2019/20 is only slightly up on the arrears figure this time lasy year demonstrating the effective work of the pilot and close working with the DWP.Ongoing dialogue with DWP
- Progressing rent and benefit service redesigns
- Maintaining a view of national picture through attendance at meetings with LGA/DWP
- Promoting council tax support (CTS)
- Consider options for council tax debt on CTS cases – work with Enforcement Agents on vulnerability issues
- Close subsidy monitoring on UC/HB related cases
- Use of specific reserve to ensure vulnerable people don't suffer and subsidy income is maximised
- Council tax support cases have started to increase back to previous levels Income generated through the earnings disregard is bringing the council in around £45,000 per week

Financial Resilience - Risks associated with austerity and the financial challenges facing BCC					
No.	**Actions to Reduce Risk to Target**	**Owner**	**Target Date**	**Progress**	**RAG**
1	**Rent Service redesign (structure review) to be implemented following successful pilot**	**Head of Income Collection**	**Dec 19**	Implement to mitigate against the impact of UC on the HRA **(Pre staff consultation)**	**Amber**
Updated BY:	**Judith H Deeks, Risk Rep.** **No further updates : 11/10/2019**	**Date:**	**30/9/19**		

Political - Risks driven by the political agenda

None

Technology								
Risk No: 16	**Risk Title: Technology – Cyber Attacks**							
Risk Description: There is a risk that web services to customers or work with partners may be disrupted by malicious attacks on the City Council's web based services.								
Risk Owner: CIO & Assistant Director (Interim) – Information, Technology & Digital Services (IT&D)	**Risk Lead:** Director, Digital and Customer Services		**Risk Type / Category:** Technology					
Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
High	**High**	Severe	**Significant**	**Significant**	Severe	**Low**	**Low**	Tolerable
Current Controls Mitigating Inherent Risk: The following control measures are routinely			Sources of Assurance on Effectiveness of Identified Controls:					

Technology	
Risk No: 16	**Risk Title: Technology – Cyber Attacks**
taken by the Council's Information, Technology and Digital Services Team: • Continuously scan the information security landscape with partners to detect upcoming and new vulnerabilities which could be exploited by potential hackers. This ensures that IT&D are aware of all risk posed by different intrusion methods. • Have updated the Councils firewalls and introduced Intrusion Prevention Services as part of the firewall implementation. This means the firewalls are receiving regular updates from the supplier to detect new and evolving types of security attack. The firewalls detect and defeat many thousands of attacks every day. • Have implemented a cloud based Distributed Denial of Service system that defends six individual websites and 8 sub-websites of the Council's main websites from high volume attacks where hackers are trying to flood the Council's websites with requests for service. This service regularly defends the Councils web sites from attackers and the contract is currently being renewed. • Have implemented the PSN walled garden which has enhanced the security of all users accessing web based government systems. PSN services have been remodelled and are currently being monitored to ensure secure transmission. • Run the majority of external facing applications behind Apache reverse proxy servers which have been hardened in line with best practice and recommendations from penetration test partners. The management of cyber risks within BCC will form part of the security strategy and responsibilities clearly defined. IT&D (bep Security programme) will ensure that the cyber risk investment strategy is aligned to, and supports strategic priorities. There is improved reporting of cyber risks and security incidents which will be presented to the Corporate Information Security Group bi-monthly. This will ensure BCC are fully	This risk can only ever be mitigated, and never fully closed due to the nature of hacking etc. • IT&D are constantly monitoring the information security landscape with solution providers to detect upcoming and new vulnerabilities which could be exploited by potential hackers. • Given the nature of this risk these activities are now being kept under constant review. • New Corporate Firewalls have been implemented to further improve/enhance our network security.

Technology

Risk No: 16	Risk Title: Technology – Cyber Attacks

aware of potential regulatory & legal exposures and can assess the implications for future investment decisions.

This is an acknowledged ongoing risk that should remain on the CRR. For reference a PSN Compliance Certificate was issued to Birmingham City Council on 27/03/18.

No.	Actions to Reduce Risk to Target	Owner	Target Date	Progress	RAG
1	BCC have undertaken a Cyber Security Stocktake and are in the process of developing a combined Cyber Security and Resilience strategy to mitigate risks identified in the stocktake.	AD & CIO	21/12/19	The approach to cyber security has been informed by 2 security reviews, from Socitm and RAND who were commissioned by the LGA. The outputs of these reviews have informed the approach to the cyber security strategy which has now been approved and an additional Security SME joins is in place to drive forward the agreed plan. The plan covers delivery of enhanced, coherent security management and is estimated to complete in early December 2019. The cyber security strategy will be closely aligned to the Information Management strategy and the overall IT&D Strategy, both of which require increased organisation-wide awareness of the need for vigilance in both physical and technological environments.	Amber

Updated BY:	Business Excellence Manager	Date:	25/10/19

Transformation

Risk No: 7	Risk Title: Failure to Deliver Culture Change and Transformation

Risk Description: In delivering significant change; industrial action; increased sickness absence levels and poor performance – any single or combination of these has the potential to divert managerial capacity from delivering outcomes, organisational effectiveness and savings.

Transformation								
Risk No: 7	**Risk Title: Failure to Deliver Culture Change and Transformation**							
Risk Owner: Director of Human Resources			**Risk Lead:** Director of Human Resources			**Risk Type / Category: Financial**		
Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
Medium	**Medium**	Material	**Medium**	**Medium**	Material	**Medium**	**Medium**	Material

Current Controls Mitigating Inherent Risk:

There are a number of low level localised disputes that could result in further escalation of service specific industrial action. There have been localised disputes resulting in a series of action short of strike / strike actions. The Council has utilised non-binding mediation as a means of seeking to resolve these matters. There are business continuity plans in place in readiness for industrial action.

Bespoke HR support is being provided to identify any high risk areas. Management to ensure contingency plans periodically reviewed in proportion to the risk to ensure 'fit for purpose' and known milestones surrounding savings and organisational change. The establishment of an Industrial Relations Specialist Unit comprising HR and Legal services to be developed and implemented ensuring that :

- we have Council wide oversight of key events timetable with the aim of managing any high risk activity and a consistency of approach.
- a review of the trade union engagement arrangements with a view to empowering managers to deliver change at the lowest level of the organisation (Kerslake Report)
- areas where there is a high risk of industrial action are to have increased employee engagement arrangements such as the Joint Service Improvement Board – Waste

Sources of Assurance on Effectiveness of Identified Controls:

Will be on-going. Despite this, overall there continues to be regular and positive engagement and dialogue with the trade unions at a corporate, regional and local level as appropriate (excluding where in dispute).

Expert HR support is being provided to areas experiencing any significant employee relations challenges relating to service redesign and headcount reductions.

All budget proposals are subject to validation via full council, before consultation with trade unions will commence. There may be some delays in delivery timescales where any applicable disputes are considered.

Focus on attendance and wellbeing occurs to provide support to employees who are experiencing change. The sickness management policy is being reviewed with a focus on support and enablement of staff attendance. A major focus will be around the application and implementation of any changed policies.

Health & Wellbeing support is offered to employees via Occupational Health; the Employee Assistance Programme and other intitiatives, including seminars and lunch time learning bites at different locations throughout the city.

Transformation					
Risk No: 7	**Risk Title: Failure to Deliver Culture Change and Transformation**				
Management. • HR/managers monitoring and taking action to minimise sickness absence as a result of organisational changes.					
No.	Actions to Reduce Risk to Target	Owner	Target Date	Progress	RAG
1	Set up Industrial Relations Unit	Director HR	04/04/19	The scope of the unit has been completed, the job descriptions have been drafted and evaluated. A decision is still awaited from the statutory leads to release the necessary funding.	Red
2	Managers to monitor employee well-being	All Managers	04/04/19	In progress and on-going, localised HR support for managers in place. ER training programme for managers being scoped.	Amber
3	Additional HR Support provided as needed	Director HR	04/04/19	On-going as required to specific disputes/programmes/service redesigns and restructures. Additional posts being proactively recruited to provide additional support in advance of upcoming major restructures	Green
4	Council wide and Directorate dashboards provided monthly to monitor organisational health	Director HR	04/04/19	Delivered monthly and on-going development to ensure the proactive action is taken using leading indicators rather than reacting to lagging indicators	Green
Updated By:	Director HR /AD HR	Date:	11/10/19		

Transformation		
Risk No: 10	Risk Title: Transformation – failing to make sufficient progress in key areas of improvement activity	
Risk Description: Failing to make sufficient progress in key areas of improvement activity identified as; waste management and industrial relations, outcomes for vulnerable adults and children, financial resilience, risk management, good governance, cultural change and organisational development.		
Risk Owner: Assistant Chief Executive	**Risk Lead:** Assistant Chief Executive	**Risk Type / Category:** Financial

Transformation								
Risk No: 10	Risk Title: Transformation – failing to make sufficient progress in key areas of improvement activity							
Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
Significant	**High**	**Severe**	**Significant**	**Medium**	**Material**	**Low**	**Low**	**Tolerable**

Current Controls Mitigating Inherent Risk:

Birmingham Independent Improvement Panel (BIIP) stepped down in March 2019 alongside the publication of a 2019 stock take report.

There has been ongoing work with MHCLG regarding the Council's own improvement governance arrangements and proposals were agreed by Cabinet in July to activate an improvement framework for 2019-20 alongside an innovative model of 'progressive assurance' through a Strategic Programme Board (SPB). This Cabinet decision was accompanied by a letter of support from the Secretary of State endorsing this model.

Key areas of future improvement activity have been identified as stated in the risk description above.

Sources of Assurance on Effectiveness of Identified Controls:

Proposals will be included in the July Cabinet report.

No.	Actions to Reduce Risk to Target	Owner	Date	Progress	RAG
1	The risk to be formally reviewed/amended to focus on strong assurance of financial, governance and specific service risks as highlighted by the external auditor in 2019.	Asst Chief Exec		New draft prepared for discussion and approval at Directorate Risk Workshop 26 June 2019. Action complete	Green
2	Non-Executive Advisors will be supporting the Council will advice in relation to specific risks to provide additional reassurance.	Asst Chief Exec		In place.	Green
3	Three reports to Cabinet (and subsequently the Secretary of State) will be forthcoming in autumn 2019, spring and summer 2020	Assistant Chief Executive (in concert with		To follow	Amber

Transformation				
Risk No: 10	Risk Title: Transformation – failing to make sufficient progress in key areas of improvement activity			
	to provide updates on the Council's improvement framework.	CMT leads)		
Updated BY:	Kwabena Osayande (Risk Rep)	Date:	25/10/2019	

Transformation								
Risk No: 18	**Risk Title:** Evaluation of Alternative Delivery Models							
a) **Risk Description:** Failure to adequately identify and agree the costs and benefits of alternative delivery models arising from Service Reviews before the decision to proceed is made. Failure to fully implement the decisions taken to change the service model to enable delivery of expected benefits / efficiency gains.								
Risk Owner: Director of Finance			**Risk Lead: Director of Finance**			**Risk Type / Category:** Financial		
Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
Significant	**Significant**	Severe	**Medium**	**Medium**	Material	**Low**	**Medium**	Tolerable

Current Controls Mitigating Inherent Risk:

Any alternative delivery model must demonstrate some benefit and better value for the Council. There needs to be the early identification of all costs, benefits, losses/impacts as part of the formulation and evaluation of options in the development of the business case.

The financial implications of any change against the existing model need to be evaluated on a case by case basis, seeking specialist advice where necessary to inform recommendations. The evaluation should be proportionate to the value and complexity of the service and the assumptions and level of confidence will need to be

Sources of Assurance on Effectiveness of identified Controls:

The Finance Business Partners will provide the necessary skills for the project requirements, as follows:

- All costs and income of the proposed model as compared with existing, together with some sensitivity and risk analysis.
- remaining costs to BCC (e.g. fixed overheads, income targets, resource requirements etc.)

Transformation					
Risk No: 18	**Risk Title:** Evaluation of Alternative Delivery Models				
made clear in order to avoid over-engineering financial modelling.				• any costs/benefits to customers/residents who are the recipients of the service These risks/costs need to be presented to and managed by the Commissioning and Contract Management Board (CCMB)/CMT and included in any cabinet reports.	
No.	**Actions to Reduce Risk to Target**	**Owner**	**Date**	**Progress**	**RAG**
1	Commissioning expertise	Director of Adult Social Care		Team established in CPS and expertise in some parts of the Council. Council-wide move to Strategic Commmissioning will ensure roll-out of knowledge	**Amber**
2	Risk to be managed on a case by case basis through proper use of the Commissioning Toolkit	Relevant SRO	Ongoing	Through reviews supported by the Finance Business Partners.	**Amber**
3	Toolkit Working with Finance Business partners on forthcoming commissioning projects CPS will establish templates and guidance for the level of financial detail required to inform decisions. Projects identified are Birmingham City Laboratories, Civic Catering and Cleaning.	Relevant SRO	On going	These services are now within the commercial business hub and will be completing reviews towards the end of 2019 with Business Partner input	**Amber**
Updated By:	Ayra Sohal, Risk Rep - No further update	Date:	21/8 2019		

Transformation								
Risk No: 44	Risk Title: Allowance Payments							
Risk Description: Unpaid allowance payments								
Risk Owner: Director Human Resources	**Risk Lead:** Director Human Resources		**Risk Type / Category:** Financial					
Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
Medium	Medium	Material	**Medium**	**Medium**	Material	**Low**	**Low**	Tolerable

Current Controls Mitigating Inherent Risk:	Sources of Assurance on Effectiveness of Identified Control:
There is a Governance Board monitoring any potential high risk claims	All new claims for allowances are being assessed on their merits and defended wherever practical. Use of overtime is being monitored on a monthly basis with strategic Directors taking responsibility for addressing any areas of concern

No.	Actions to Reduce Risk to Target	Owner	Date	Progress	RAG
1.	As new case law is decided challenges to payments have arisen: Holiday pay sleeping in allowance where case law remains ambiguous so claims on hold Travel time – currently a subject of internal challenge, but may become a matter for Employment Tribunal. Monitored by Governance Group	Director HR	On going		Amber
Updated by:	**Director HR**	Date:			

Service Delivery	
Risk No: 6	**Risk Title**: Failure to achieve all of the services required including delivery of significant investment into the Highway network within the first five years of the contract.

Risk Description: Failure to meet the council's objectives going forward with the Highway Maintenance and Management PFI contract, these are to:

i. Obtain the investment for which we are paying;
ii. Retain the capacity and financial support from government;
iii. Ensure we manage the contract and only pay for what we receive; and
iv. Develop a way forward that will enable us to have confidence in future delivery.

Risk Owner: Director Inclusive Growth	**Risk Lead: PFI Contract Manager**	**Risk Type / Category: Partnership / Contractual**

Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
High	**Significant**	Severe	**High**	**Significant**	Severe	**Low**	**Significant**	Material

Current Controls Mitigating Inherent Risk:

A settlement agreement was signed with Amey, the SPV and project lenders on 29 June 2019 in accordance with Cabinet's approval of 25 June 2019. Amey LG will be replaced on 1 April 2020

Delivery risks remain but a settlement is the first step in moving forward. We are engaging with potential suppliers to understand market issues for providing services in the short and longer term. A way forward will be presented to Cabinet in autumn 2019

Sources of Assurance on Effectiveness of Identified Controls:
The terms of the settlement agreement provide assurance as detailed in the Cabinet decision of 25 June 2019.

Advice taken from Legal Services, together with external advice (including counsel where appropriate).
External financial advice has also been secured.

No.	**Actions to Reduce Risk to Target**	**Owner**		**Progress**	**RAG**
1	Develop and commence delivery of a programme of investment to work towards	Highways Asset	Sept 2019	The settlement provides a minimum of £50m of investment subject to funding being available. This commitment now needs to be turned into an acceptable programme to be	**Green**

Service Delivery					
Risk No: 6	**Risk Title**: Failure to achieve all of the services required including delivery of significant investment into the Highway network within the first five years of the contract.				
	completion of the Core Investment Period in an acceptable timescale.	Manager		delivered by the SPV. A small number of Priority Schemes have now been agreed and are being progressed. Further work will be determined by a revised payment model	
2	Continue to progress a delivery solution that ensures the PFI grant is retained.	AD/ PFI Contract Manager	Sept 2019	We are working with Government and the SPV to ensure a delivery solution that enables the PFI grant to continue in the long term, subject to a way forward being agreed.	**Green**
3	Continue to manage performance under the contract until a way forward is agreed with Amey.	PFI Contract Manager	Sept 2019	Performance continues to be managed in line with the proposed settlement terms. A Cabinet report is being prepared for a meeting on 12 November with a full RR. The risk owner is unable to provide an update at this time but once the cabinet report is completed then he will be in a position to update	**Green**
Updated By:	PFI Contract Manager, IG Risk Rep	Date:	24/10/19		

Service Delivery								
Risk No: 39	**Risk Title:** HS2							
Risk Description: Delivery of HS2 following Royal Assent of HS2 Act. BCC role to help facilitate delivery of new railway (including Curzon Station and depot). Maximise benefits for City and minimise / mitigate impact during construction.								
Risk Owner: Director Inclusive Growth	**Risk Lead**: Development Planning Manager		**Risk Type / Category: Reputational**					
Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
Significant	**Significant**	Severe	**Medium**	**Medium**	Material	**Medium**	**Medium**	Material
Current Controls Mitigating Inherent Risk:			Sources of Assurance on Effectiveness of Identified Controls:					

Service Delivery					
Risk No: 39	**Risk Title:** HS2				
Risk Description: Delivery of HS2 following Royal Assent of HS2 Act. BCC role to help facilitate delivery of new railway (including Curzon Station and depot). Maximise benefits for City and minimise / mitigate impact during construction.					
Still to be obtained				Still to be obtained	
No.	**Actions to Reduce Risk to Target**	**Owner**	**Target Date**	**Progress**	**RAG**
1	HS2 governance established including regular meetings on individual projects (station, depot etc.) Regular meetings with HS2 Ltd including HS2's planning team regarding programme for Schedule 17 applications and other consents. New burdens on local authority recognised by HS2. Service Level Agreement (SLA) has been completed and signed. Internal meeting established at Directorate level to co-ordinate and support work and address any issues. Joint working with HS2 is ongoing to develop the design of the station,	Developme nt Planning Manager	Curzon Station S17 Autumn 2019 (further application s to follow)	The Council is supporting the response to the Oakervee Review which is being led by the WMCA. A taskforce has been pulled together with representation from all stakeholders, including the Council, to provide a robust evidence base for the benefits of delivering the HS2 scheme in full. The outcome of the review could include different options such as cancelling the scheme, de-scoping and changes to the delivery timetable for each phase. It will conclude in the Autumn at which point the full impact of any changes can be identified. On-going meetings and joint working between BCC and HS2 officers take place on a regular basis to ensure progress on all workstreams within HS2, including highways, development, planning and employment. An internal Board has been established at Directorate level to co-ordinate and support work and address any issues for each workstream. The Schedule 17 planning application for the HS2 Curzon Station is programmed for submission in Autumn this year, subject to the outcome of the Oakervee review (the independent review into the HS2 project which will look into whether and how the HS2 will proceed). An outline business case for the enhancement of the public realm surrounding the Curzon	Amber

Service Delivery					
Risk No: 39	**Risk Title:** HS2				
Risk Description: Delivery of HS2 following Royal Assent of HS2 Act. BCC role to help facilitate delivery of new railway (including Curzon Station and depot). Maximise benefits for City and minimise / mitigate impact during construction.					
	including the public realm, which will create a world class arrival to the city, whilst also improving connectivity to the wider area that will maximise the economic impact of HS2. Early engagement has taken place with Planning Committee and senior BCC officers regarding the design of the Curzon Station. Funding has been secured through the Enterprise zone to improve the design over and above the base scheme developed through the HS2 Act. Curzon Station design has now been launched publicly and HS2 have held a series of consultation events on the design.			station has been approved by the GBSLEP and is due for consideration by Cabinet in October 2019. The invitation to tender for the station design and build contract will commence in March 2020. A key interface for the project is with the Eastside Metro Extension project that is due to receive its Transport and Works Order Act imminently. A key risk for both projects is the timing and delivery of both schemes and may be affected by the outcome of the Oakervee review. A joint WMCA, HS2 and BCC Board, comprising directors of all organisations, meet on a monthly basis to review progress and risks.	
2	The SLA is now signed to provide the appropriate resources needed to meet the requirements for Schedule 17, Schedule 4 applications etc.	Developme nt Planning Manager	On going submission of timesheets		**Amber**

Service Delivery					
Risk No: 39	**Risk Title:** HS2				
Risk Description: Delivery of HS2 following Royal Assent of HS2 Act. BCC role to help facilitate delivery of new railway (including Curzon Station and depot). Maximise benefits for City and minimise / mitigate impact during construction.					
	Pre applications on-going regarding the number of schedule 17 planning applications.				
Updated by:	Development Planning Manager IG Risk Rep.	Date:	24/10/2019		

Service Delivery								
Risk No: 40	**Risk Title:** Commonwealth Games – Athletes' Village							
Risk Description: Delivery of the Athletes' Village dependant on funding & acquisition of land in addition to potential changes to sporting schedules affecting villages capacity to accommodate athletes								
Risk Owner: Director, Inclusive Growth	**Risk Lead** Change Specialist		**Risk Type / Category: Reputational**					
Inherent / Gross Risk			**Residual / Current Risk**			**Target Risk**		
Likelihood	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**	**Likelihood**	**Impact**	**Prioritisation**
Medium	**Medium**	Material	**Medium**	**Medium**	Material	**Medium**	**Medium**	Material
Current Controls Mitigating Inherent Risk:			Sources of Assurance on Effectiveness of Identified Controls:					
No.	**Actions to Reduce Risk to Target**	**Owner**	**Target**	**Progress**				**RAG**

Service Delivery					
			Date		
1	Funding	Change Specialist	November 2019	Tier 1 returns exceeded the target cost due to market conditions, tight timescales, and the level of challenge with building a scheme of this size and complexity. A significant amount of work has been undertaken in terms of introducing competitive tension, value engineering, scheme redesign and commercial review. Wider scheme reconfiguration is also being considered. PSC arrangements are in place with the preferred Tier 1 contractors for plots 6, 7, 8, 9 and 1. This will enable the costs and programme to be fully worked up for each plot. The project continues to work with the Tier 1's to reduce the cost plans received. Risk classified as High/High	**Red**
2	Land Acquisition -	Change Specialist	March 2020	The CPO Inquiry confirmed in favour of BCC on 11th September 2019. Significant land area was acquired, or under offer or secured through another route before the Order was confirmed. Work is ongoing with land owners and vesting expected to take place during the first quarter of 2020. Residual status of this element of the risk is changed to green and downsized to medium/medium	**Green**
3	Changes to sporting schedules resulting in increased accommodation requirements -	Change Specialist	June 2020	An announcement on the outcome of the sports review was made in August, this has confirmed the addition of three further sports. There has been no request for additional bed spaces to be made available within the village and so It is understood that there is no impact on the bed space requirements to be delivered by Birmingham to facilitate these additional sports. The provision remains at the previously agreed level of 6500 bed spaces and currently there is no reason to suggest that BCC will not meets it obligation to provide 6500 bed spaces.	**Green**

Service Delivery					
				This element of the risk can be closed.	
Updated BY:	Change Specialist	Date:	22/10/2019		

Removed Risks (previous 5 years):

Ref No.	Risk description	Reason for removal	Date removed
2015/16.08	Insufficient resources (finance & people) to agree / deliver the change programme.	Cabinet approved a report on 20th April 2015 that set out the Children's Social Care and Early Help Improvement Plan for 2016-2018, including the appropriate financial envelope for the plan.	July 2015
2015/16.25	Supply chain failure by reason of supplier withdrawal, liquidation or contract non-compliance.	Following identification of this risk, processes and procedures were developed and rolled out to key contract managers across the organisation with supply chain risk assessments being completed by suppliers. The supply chain risk assessment process is now captured as an annual activity within the supplier annual reviews and the Council's contract management toolkit.	July 2015
2015/16.26	PSN resubmission.	The Council has successfully retained PSN submission till April 2016.	July 2015
2015/16.27	Financial implications of failing to meet obligations regarding climate change and sustainability - carbon tax cost.	We have made four submissions out of four without issue (and passed an Environment Agency Audit in 2011), giving a 100% success record. The 2014/15 return is progressing normally.	July 2015
2015/16.28	Potential for disruption to council services due to the need to transition to a new Banking Services provider with effect from 1/4/2015.	The banking transfer has been successfully concluded.	July 2015
2015/16.10 a	Resolution of contractual issues in the Highway Maintenance & Management PFI contract.	A commercial settlement signed on18th December 2015, resolved a number of contractual issues.	March 2016
2015/16.29	Risk of Court deciding against the Council regarding the Homeless Service.	The High Court dismissed the four applications for Judicial Review.	March 2016
21 (old 35)	IT refresh / update.	The desktop refresh is progressing as business as usual, and PSN compliance means that we cannot have unsupported applications running on our network.	July 2016

Ref No.	Risk description	Reason for removal	Date removed
23 (old 59)	Risk of enforcement action and fines of up to £500,000 by the Information Commissioners Office (ICO) for failure to comply with the 40 day timescale for responding to Subject Access Requests (SARs).	There has been considerable improvement in responding to Subject Access Requests. The Information Commissioner's Office is happy with the progress being made and are no longer monitoring the Council.	November 2016
8 (old N/A)	Risk of challenge regarding implementation of the Younger Peoples Re-Provision Programme.	The work stream is now closed, and efficiency and savings targets have been transferred to the Maximising Independence of Adults (MIA) Board.	March 2017
9 (old 57)	Failure to respond fully and effectively to the issues from recent reviews concerning school governance and related matters.	A much improved performance culture and set of arrangements are now in place for the Council's education services.	March 2017
13 (old 28)	Not planning appropriately for the on-going reduction in government grants.	This is an annual risk, but there are processes in place to manage it.	March 2017
24 (old N/A)	That the need to address the updated Pensions Deficit will result in an increase in employer contributions.	This risk crystallised in the setting of the 2017/18+ budget. The information received has been fully taken into account in the update of the Council's medium term financial plan, and in the development of savings proposals.	March 2017
28	Risk that in its early stages of delivery the Sustainability Transformation Plan (STP) will not alleviate the financial position of social care.	The Council budget from April 2017 does not make assumptions regarding this proposal contained in the previous year's budget; and is no longer a major financial risk to the organisation.	July 2017
22	Risk of fines from HMRC for Directorates employing long term consultants.	There are now processes in place for the engagement of off payroll individuals.	November 2017
27	Risk of claims for payback of search fees charged by the Council.	The potential liability is less than £160k, and this risk will be monitored via the directorate risk register.	November 2017
4	Defend and or settle pre 2008 equal pay claims	Equal pay risks have been reworded and updated and included on one risk No1.	March 2018
5	Further equal pay claims	Equal pay risks have been reworded and updated and included on one risk No1.	March 2018

Ref No.	Risk description	Reason for removal	Date removed
14	Insufficient in-house IT expertise within Directorates	Transition of Service Birmingham	March 2018
19	Delivery of Localisation Agenda	Majority of work has now progressed	March 2018
20	Allowance Payments	The bulk of unpaid allowance claims have been successfully managed by Legal Services. All other new claims are being assessed on their merits and defended wherever practical.	March 2018
3	Failure to identify alternative funding stream for school PFI contracts revenue pressures.	Immediate concern over PFI gap has been met. Longer term concerns are being evaluated.	July 2018
11	GDPR	Incorporated into one single risk on information assurance – Risk No.11	November 2018