Hackney Corporate Risks May 2018

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Risk Title	Description of Risk	Directorate	Current Risk Matrix	Risk - Latest Note
SRCR 0001 National and International Economic Downturn EXTERNAL RISK CURRENT & FUTURE RISK	There is an ongoing risk to the Council's finances arising from austerity measures that the Government are continuing to take. This is now likely to be compounded by the effects of the impending Brexit. There is the challenge of finding around a further £34m of efficiency savings up to 2021/22 and possibly more beyond that time. This poses a risk that as a result of reductions made to services and overall funding, the quality and outcome of work impacts adversely on stakeholders, leading to local dissatisfaction and damage to the Council's reputation. Tighter finances result in less capital, repossessions, and potential developments frozen, affecting potential economic development and social infrastructure. This all contributes to a risk of real poverty and inequality emerging in areas of the Borough.	Chief Executive's; Children, Adults & Community Health; Finance & Corporate Resources; Neighbourhoods & Housing	Likelihood	May 2018. Risk ongoing due to continuing and proposed cuts by the government. Recent revenue budgets and Capital Programmes have been put together against the backdrop of some of the most significant reductions in Central Government support to Local Government since World War Two. The result of the EU Referendum on June 23rd 2016 and the subsequent plans for Brexit (cemented by triggering Article 50 on 29/3/17), is already proving to have a negative financial impact, although not perhaps as severe as some economists predicted. The increase in interest rates (from 0.25 to 0.5%) in November 2017 hints at a slight improvement in some areas. Ongoing Central Government cuts mean that Hackney must work with £130 million less a year than in 2010, while rising costs and increased demand for services have added a further £42 million of expenditure for the Council to find each year. In fact local authority core funding has reduced by 35% over the period 2010/11 to 2018/19. The total budget for 2018/19 was £1,074 million, down £17 million on the previous year. All these points illustrate the undeniably challenging financial predicament of the Council. Clearly, this risk is ongoing and the need for efficiency savings

	will not diminish in the foreseeable future (especially with Brexit). Therefore this will have an impact on the Council which needs to be carefully managed. Proposals are being developed to manage an expected further reduction in resources of approximately £34m by 2021/22. Score remains at 20 with no movement due to the extremely high impact of the financial consequences.
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SRCR 0001B National and International Economic Downturn	There is a need to ensure that the Medium Term Financial Plan accurately reflects best estimates of future funding levels. Financial planning will be constantly diligent and reflect the changing circumstances of budgets available. Also, controls from other related risks are relevant, e.g. Regeneration projects and Recruitment and Retention [increasing access routes into the Council's employ].	Tim Shields; Ian Williams; Kim Wright; Anne Canning	Ian Williams	31-Oct-2018	May 2018 - action ongoing. Progress made in various areas should provide assurance that even in challenging circumstances, the Council is well placed to manage its duties.
SRCR 0001A National and International Economic Downturn	Whilst the overall risk is external and largely beyond control of the Council, there is a clear need to identify, implement, monitor and resource the delivery of significant reductions in expenditure and to ensure the services that continue to be provided are resourced adequately. Also, Officers' advice to members needs to be explicitly clear as to what can and cannot be delivered including the organisations ability to deliver and implement the commitments contained within the local manifesto.	Tim Shields; Ian Williams; Kim Wright; Anne Canning	Ian Williams	31-Oct-2018	May 2018 - action ongoing.
SRCR 0001D National and International Economic Downturn	Savings proposals were developed and agreed with members in order to bridge the forecast reduction in resources in 2017/18 and subsequent financial years. At the same time, the capital programme is subject to review to ensure that available resources are used to deliver Council priorities. Several measures, including numerous restructures, have been used to reduce overall expenditure levels across the Council. There are also continuing efforts at seeking ways to generate additional income, for example in the use of Corporate Estates for events / changes in service delivery models etc. This is already resulting in considerable savings to help mitigate the risk of funding cuts.	Tim Shields; Ian Williams; Kim Wright; Anne Canning	Ian Williams	31-Oct-2018	May 2018 - ongoing. The Senior Management restructure was completed and the final transitional arrangements came to an end in April 2017. Various other restructures (eg ICT) are ongoing.

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SRCR 0001A Brexit Implications EXTERNAL RISK CURRENT & FUTURE RISK	Following on from the UK's vote in favour of leaving the EU in June 2016, the fallout from this is likely to produce some serious risks to the Council and country as a whole. Financial issues (external to the Council) could impact massively on income levels, spending ability, and general resources across all areas. Also risk of hate crime occurring. Stock markets could fall significantly resulting in a serious impact to	& Community Health; Finance & Corporate Resources;	Impact	May 2018 – Article 50 was triggered on March 29 th 2017, formally commencing the exit process, which will complete in around 9 months. This risk increased at the last review a few months ago, as the process had become a reality and problems such

the Council's pension funds. The likelihood of an increased triennial valuation is much higher, and the risk of the need for increased general contributions emerges. Also with reduced interest rates, Brexit could continue to impact on treasury investments. The impact of Brexit on exchange rates for Sterling means that there is a risk of material cost increases due to the direct and indirect impact on pricing for software and hardware (the Council may see price rises as suppliers pass on increased costs affecting their own ICT services).	& Housing	as the pound's weakness have caused the Council some clear losses in purchasing (especially ICT equipment which is bought in dollars). The risk has now remained static since that review. Additionally, in light of the 'divorce' settlement agreed in December, there now seems less chance of an 'unruly' exit (and the economic uncertainty that would ensue) and guarantees the rights of EU citizens living in the UK. In the immediate aftermath of Brexit, some of the more pessimistic outlooks were not realised, with the markets remaining steady, but economists suggest the outlook looks gloomy. Also an atmosphere of political unrest is present especially in areas like Hackney which were predominately in favour of remain. Thankfully, in Hackney, hate crime has not been an issue as yet (Safer Communities would monitor this).
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SRCR 0001A Brexit Implications	A separate Brexit Risk Register has been produced and all relevant parties have contributed to it. This is addressing the range of risks that have come about as a result of this referendum.	Tim Shields; Ian Williams; Kim Wright; Anne Canning	All	12-Oct-2018	Ongoing
FR DR 0007 Consider potential pricing fluctuations when planning purchases.	The uncertainty of global currency markets and supplier responses to fluctuations means that it is extremely difficult to mitigate this risk. Where possible consideration will be given to the potential of pricing fluctuation when planning purchases and commissioning. This will be an ongoing activity (no fixed end date).	Tim Shields; Ian Williams; Kim Wright; Anne Canning	Purchasing managers	Ongoing	Updated May 2018
FR DR 0007b Brexit impact on Treasury and Pensions	Ongoing monitoring of financial markets and close communication with Pension Fund Investment managers/investment consultants. Additionally, there has been ongoing monitoring of financial markets and regular communication with treasury advisers. Monitoring of both interest rates/ yields as well as the impact on the credit risk of potential investment counterparties, especially UK based institutions.	Ian Williams; Michael Honeysett	Rachel Cowburn, Pradeep Waddon	Ongoing	Following the leave vote, the Pension team was in immediate contact with fund managers and Investment consultants, receiving commentary from each fund. Pension Committee has received numerous updates and reports and, following the advice of the investment consultants, agreed not to take any immediate action and to monitor the impact on an ongoing basis. Also, UK gilts yields have already reached a record low and the UK base rate marginally increased back up to 0.5% early in 2018.

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SRCR 0002 Management of Capital Programmes / Schemes EXTERNAL RISK FUTURE RISK	From a financial perspective, as a result of substantial external borrowing to fund the ambitious capital programme, the Council moves from a debt free position and become more vulnerable to changes in the market (potential volatility of the housing market affecting sales volumes / value and increasing building costs as a result of weaker GBP against other currencies). This could lead to financial pressures as unexpected costs of borrowing would be incurred. Additionally, Major Capital Schemes may not be managed or targeted effectively to maximise use of resources available and ensure delivery according to expectations. This poses a risk to the successful completion of such schemes, incurring losses and dissatisfied stakeholders.	Chief Executive's; Children, Adults & Community Health; Finance & Corporate Resources; Neighbourhoods & Housing	0	May 2018 - This risk is ongoing and intensifying somewhat in light of the quantity of high level programmes across the Council. Particularly in regards to property development, the ambitious capital programme requires forward funding, pending future sales of private residential units on completion of regeneration and other mixed use development schemes. In terms of this financial year, the capital programme for 2018/19 is £429m (non-Housing schemes totalling £207m and Housing schemes totalling £222m). The plans for Britannia of course, go beyond Housing, which makes this scheme all the more important, and one of the most ambitious in the programme. There are detailed separate risk registers for projects such as Britannia. Britannia has a commercial lead on its senior Management Team and has contracted Arcadis to provide construction cost advice on the School, and financial viability advice for the project, and CoreFive to provide construction cost advice on the leisure centre and residential aspects of the project. This will provide greater financial certainty to Britannia, enabling more informed decision making by the Officer Steering Group and Project Board established to govern it. This should also provide extra assurance about how a major project is being managed. This risk earlier in 2017 was scored as a 4 x 4. Because of the increased quantities of forward funding here the impact had to rise to a 5, however the likelihood could decrease to a 3 as the controls (and previous experience) provided assurance that the Council was well positioned to manage this risk. Since January, the risk has remained stable.

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SRCR 0002A Management of Capit Programmes / Schem	laction taken The dijarteriy monitoring that is inclined in the regular	Williams; Kim Wright; Anne	Michael Honeysett	31-Oct-2018	May 2018 – ongoing. The latest Capital Programme has been agreed (at £429m) and no revisions announced as yet.

	in future performance review report to Audit Committee. The Capital Monitoring Reports will include more discrete data regarding the actual delivery of the capital programme.				Last year's actual capital expenditure to March 2018 was at £271,000,000, £8m below the current revised budget. Such regular (quarterly) reporting should provide increased assurance that everything is being astutely managed, especially with out-turns being below budget.
	Major schemes are managed via project boards to ensure appropriate actions are taken to ensure delivery of scheme to expected standards	Tim Shields; Ian Williams; Kim Wright; Anne Canning	Michael Honeysett	31-Oct-2018	May 2018 - ongoing.
SRCR 0002C Management of Major Capital Schemes	The Capital programme is currently subject to overall review in order to reduce the overall call on available resources and to ensure their use is prioritised in line with member decisions.	Tim Shields; Ian Williams; Kim Wright; Anne Canning	Michael Honeysett	31-Oct-2018	May 2018 - ongoing. A refresh of the capital programme has been completed as part of the budget process for 18/19 - and a review of the overall corporate strategy.

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SRCR 0003 Regeneration Programmes EXTERNAL RISK CURRENT & FUTURE RISK	 There are a number of key risks which require careful management between Regeneration and a range of services across the Council, including finance, procurement and planning. Major risks are associated with: Risks around certainty of future funding, and the need to contain borrowing within the HRA Debt Cap. If this is not contained, there may be serious financial consequences. There could also be further (post Grenfell) pressures around funding relating to potential new requirements for fire safety works to council housing stock, which must be funded through the HRA. Procurement and performance related risks with developer/contractor partners. Falls in property values could impact the viability of schemes. Challenges around social cohesion associated with potential increased polarisation, greater transience and reduced housing affordability. An uncertain economic environment, particularly as a result of Brexit, poses risks to projects that rely mainly or partly on disposal of assets or the subsequent sale of newly developed properties. 	Neighbourhoods & Housing	Impact	May 2018 - There are a number of regeneration projects ongoing across the borough, including the nationally significant Woodberry Down programme and the borough-wide Estate Regeneration and Housing Supply programmes. These have substantial borrowing requirements which, if not carefully project managed, could adversely impact the Council's overall financial position.

Control Title	Control Description	Responsible Officer	Service Manager	Due Date	Control - Latest Note
NH DR 006a Regeneration Programmes	Application of sound programme and project management methodology for delivery of complex programmes and projects including reporting where agreed tolerances have been exceeded, and finance assessment of business cases including those that need to be revised.	Kim Wright	John Lumley	Ongoing	May 2018 - Risk reviewed and updated.
NH DR 006b Regeneration Programmes	Robust programme management and governance procedures in place for key capital projects and programmes with project sponsorship at Director level. Major schemes are managed via project boards to ensure reputational issues managed and project/programme outcomes delivered to required standard, on time and within budget.	Kim Wright	John Lumley	Ongoing	May 2018 - Risk reviewed and updated.

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SRCR 0009 Reputation Management INTERNAL RISK FUTURE RISK	Risk that (through press / media) perceptions about the Council's performance/image do not reflect relative levels of performance and the huge service improvements leading to public dissatisfaction or misunderstanding about the progress actually being made. Essentially, this risk is about not capitalising on the opportunity that the Council's positive progress presents us with.	Chief Executive's; Children, Adults & Community Health; Finance & Corporate Resources; Neighbourhoods & Housing	Likelihood	May 2018 – At the last review, the risk decreased slightly due to positive progress made, however has remained stable since. Although the scale of continuing funding reductions announced in the 18/19 settlement is sizeable, the risk has not increased due to careful mitigation. Impact remains steady, benefitted by an (external) website and (internal) intranet refresh. However, past MORI results and continued positive media coverage, prestigious events and other awards illustrate that this risk is being managed. In 2016, the Council was awarded the prize by the LGC for 'Best Council of the past 20 years". This clearly indicates positive progress. Also, more generally, the Olympics (and now their legacy) are an excellent example of something very major being communicated in a positive and effective way (an example of a risk - for things could have gone wrong - being turned into an opportunity). The Risk applies to all Directorates, but is centrally managed by Communications.

Control Title	Control Description	Responsible	Service	Due Date	Control - Latest Note

		Officer	Manager		
SRCR 0009A Reputation Management	Key ongoing activities include active press engagement, key stakeholders involvement, MORI and active media coverage. Corporate Communications are very proactive in managing this and always quick to respond to any issues. Media monitoring is carried out quarterly and examines coverage of Hackney as a Council and a Borough. Analysis of this informs communication work plans. Collection and use of robust performance and customer intelligence. A two pronged approach is taken to the specific risks associated with reduced funding: firstly communications associated with overarching budget setting and secondly communications associated with major changes to specific services. There is also a 6 weekly forward public affairs forward plan circulated to senior management and members.	Tim Shields	Polly Cziok	30-March- 2018	May 2018 - ongoing. Controls continue to be applied.

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SRCR 0010 Pension Fund EXTERNAL RISK CURRENT & FUTURE RISK	General market volatility, and recent legislative changes (eg- the future asset pooling of resources and also the opportunity for 'Freedom and Choice') poses risk to investment returns which underpin Fund performance and ability to meet future liabilities without additional financial burdens on taxpayer. If investment returns are poor with a post Brexit plummeting of stock markets, or the outflow of resources is much larger than expected or an asset category seriously underperforms, this will have serious financial implications for the Pension Fund and ultimately add cost pressures to the Council's budget via employer's pension contributions.	Finance & Corporate Resources	Treilhood Inhant	May 2018 - Risk ongoing. The impending Brexit continues to pose risks in the future about meeting liabilities. In its immediate aftermath (June 2016), the initial impact on the markets was negative, but steadied in the following weeks, and has steadily gained strength in the 18 months since. The impact on the strength of the pound has been negative however. In light of this, the economic climate remains volatile. The likelihood of this risk occurring is relatively high, given the likelihood of challenging conditions in investment markets and the impact of changing demographics. The impact has to remain high, given the potential threat to the Fund's ability to pay benefits when they are due. In Oct 2015, the Government called for the assets of the 91 LGPS funds in England and Wales to be pooled into 8 pools of approximately £25bn+ of assets. The Council are now in the process of transferring the first tranches of assets to the London CIV. These proposals will incur transition risks, as well as overall strategic ones so the

		whole process is being managed carefully, although the overall aim is to make efficiencies in investment costs.
		Of course, an increase in the UK's interest rates could represent an opportunity of sorts for the Council, and Asset Pooling may lead to greater saving and efficiencies. All is being monitored closely.

Control Title	Control Description	Responsible Officer	Service Manager	Due Date	Control - Latest Note
SRCR 0010D Pension Fund	The funding of the Pension Fund liabilities continues to be monitored closely and the Fund seeks to mitigate systemic risk through a diversified portfolio but it is not possible to make specific provision for all possible eventualities that may arise under this heading.	Michael Honeysett; Ian Williams	Rachel Cowburn	31-Oct-2018	April 2018 - ongoing
FRFSV 0052D Knowledge and Skills	Ensuring those charged with governance of the Fund and for managing the day to day operations have the requisite knowledge and skills to make informed decisions when managing the funding position. Regarding proposed (asset pooling) changes, all consultations and guidance from the Government are being monitored, and responded to where appropriate.	Michael Honeysett	Rachel Cowburn	31-Oct-2018	Updated April 2018 - ongoing
FRFSV 0053B Pension - Valuation Monitoring	Triennial Valuation assesses the funding position, intervaluation monitoring ensures that movements in the Funding position can be assessed and strategies to manage any deterioration are put in place. Assessment of liabilities at the triennial valuation and the roll-forward of liabilities between valuations helps identify – financial mismatch / falling risk free returns on government bonds / higher than anticipated inflation / increasing fund maturity / insufficient deficit reduction payments.	Michael Honeysett	Rachel Cowburn	31-Oct-2018	Updated April 2018 - ongoing.
FRFSV 0053C Identifying the external risk factors that affect the funding position	Identifying the various risk factors, asset/liability, investment, longevity, interest rates, inflation, liquidity, etc and how the interaction of these impacts on the funding position and adapting the strategy and business plans to manage these risk where feasible. Also regarding future Asset Pooling, planning for transition is considered as part of the Investment Strategy development to ensure assets are transitioned efficiently and within the required timeframes.	Michael Honeysett	Rachel Cowburn	31-Oct-2018	Updated April 2018 - ongoing.
FRFSV 0042D Appropriate levels of knowledge and skills to make decisions	Use of external advisers to assist in making investment decisions and ensuring that decision takers understand the investments of the fund. There is ongoing monitoring of financial markets and close communication with Pension Fund Investment managers/consultants.	Michael Honeysett	Rachel Cowburn/ Pradeep Waddon	31-Oct-2018	April 2018 - Ongoing. Detailed reports get taken to Pensions Committee at regular intervals providing them with the assurance that risks are being managed.

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		The Council may not be able to respond to external influences on legislation and updated policies, thus risking the efficiency and effectiveness of service provision. Also if requirements of any new act are not met, there would be an adverse impact on the Council's legal and reputational standing.
	SRCR 0013 Impact of New Legislation (and Welfare Reforms) EXTERNAL RISK	For example, as a result of the new policies affecting housing (mainly contained within the Housing & Planning Act 2016), the Council's financial position may be adversely affected, constraining its ability to invest in the development of new affordable homes. Many of these policies could also have damaging consequences for the local community and many people currently living in Hackney.
- 11	FUTURE RISK	Additionally, the impact of new legislation - seen in areas such as Welfare Reform (especially Universal Credit) - could result in an increase in rent, service charge, arrears, higher legal costs, increased evictions and pressure on the vulnerable.

Further effects of new legislation could be financial, legislative (with a

failure to understand the breadth of responsibility) and reputational,

directly affecting the local community. There could also be issues

amongst the local community in terms of dissatisfaction, lack of

understanding and increased financial difficulties.



Chief Executive's; Children, Adults & Community Health; Finance & Corporate Resources; Neighbourhoods & Housing



May 2018 -The Homelessness Reduction Act (April 2018), GDPR (May 2018) and The Housing and Planning Act 2016 are all examples of recent legislation having a significant impact on the demands to the services of the Council. The changes within the Education Bill have not materialised as it was scrapped, however further legislative changes are anticipated in this area in the future. The EU Referendum results and triggering of Article 50 continue to pose great uncertainty going forward. Regarding welfare, the proposed tax credit changes were retracted, however Universal Credit will present numerous challenges which are already being planned for in great detail, and this will come into force later in 2018.

Furthermore there are other forthcoming examples of proposed legislation that could impact on the carrying out of Council functions, and the risk that needs to be managed is the implementation process and the financial and human resources that may be required. This needs to be kept under review as each legislation is passed and implemented. Likelihood of risk has marginally dropped due to assurance provided by Council's robust approach to new legislation

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SRCR 0013 Impact of New Legislation	The Council continues to monitor and respond to consultations regarding service delivery and other innovations to ensure that it is fully aware of new and changed initiatives and can react accordingly. All managers keep up to date with external developments which may impact on their work. Careful project and programme management is undertaken to deal with any serious reforms and their implementation. There is a monthly Corporate Law Update outlining all the latest legal developments and their potential impact on the Council.	Tim Shields	Suki Binjal	31-Oct-2018	May 2018 - ongoing.
SRCR 0013A New Policies affecting Housing	Detailed analysis is being carried out regarding the likely impact of these policies, both internally and with other boroughs and representative organisations. In the case of the Forced Sales levy, this analysis is currently hampered by having few details about how the	John Lumley	Ajman Ali	31-Oct-2018	Updated April 2018

	scheme will operate. However an assessment of the potential impacts			
	is being carried out on a range of assumptions and scenarios.			
	Individually and with other boroughs, the Council continues to actively making the case to Government for flexibilities to mitigate the adverse effects of these policies.			
	Once the detailed Statutory Instruments have been published (timescales still unclear), the likely impacts of the various policies can be more accurately be assessed and work can continue on preparations to implement the measures in a way that best mitigates the impacts on the Council and residents.			
	1% reduction in rents: The current HRA savings plan delivers a fully resourced HRA business plan and keeps HRA borrowing below the debt cap. The HRA business plan is monitored annually as part of the budget setting process, taking into account arising cost pressures, changes in government policy and legislation, and any service changes.			
	Forced Sales Levy: To mitigate the impact of this policy, the Council intends to develop a disposal and investment strategy that:			
	 minimises the impact on mixed communities and meets the highest priority housing needs; and raises the funds necessary to both pay the levy and provide genuinely affordable replacements. 			
	Starter Homes: The Council has made and continues to make the case to Government that Starter Homes should not be included within the definition of 'affordable housing' in Hackney. We will work with the London Mayor to help make the case for a workable implementation of the initiative in London and, though the Local Plan review, ensure that this is addressed in local planning policy.			
	Homelessness Reduction Bill: The Homelessness Reduction Bill was agreed by Parliament and has now received Royal Assent. The date for implementation was this April (2018). The impact of the Bill is significant for the Council taking into account the impact of the 56 day 'nowhere safe to stay' duty, changes to s21 notices, the additional reviews anticipated and the additional resources required to carry out assessments and manage the necessary additional temporary accommodation. The total cost could amount to up to £11.4m in year 1, as well as placing significant additional strain on the Council's temporary accommodation estate.			
SRCR 0013B Care Act 2014	This Act has reformed the law relating to care and support for adults and the law relating to support for carers. Detailed work has been undertaken to ensure its effective implementation, and clear timescales and budgets which need to be adhered to. Adult Social Care managers have a robust monitoring system in place to track the	Anne Canning	31-Oct-2018	The Care Act introduced serious changes and new responsibilities for local authorities with broad changes in social care and delivery in tight timescales. Although the

	impact of the Care Act which will inform service and financial planning.				introduction of the cap on care costs was deferred until April 2020 (and now been further postponed), the introduction of the national eligibility criteria is widening the responsibility of the Council in respect of care and support and increasing demand for services. Potential consequences of this risk could include a major adverse impact on the Council's financial health and Adult Social Care savings delivery plan. Additionally there would be a strong additional demand on services. Also if requirements of any new Act are not met, there would be an adverse impact on the Council's legal and reputational standing.
FR RV 1617 Impact of new Welfare Refo	The risks have been / are being managed by detailed programmes of training and briefings for staff, DHP training for frontline staff, and letters explaining any changes. There has been a communication strategy specifically developed for this so that the public have everything explained and broken down as comprehensively as possible. Resident's briefings, 'surgeries', and online explanations also further contributing to making transitions as smooth as possible.	Ian Williams	Kay Brown	31-Oct-2018	Control updated May 2018. Welfare Reforms (introduced in recent years and still continuing) include benefit caps, new rules on under occupancy, and changes to DLA, Council Tax Support and also Universal Credit (coming into force later in 2018). All these reforms could result in an increase in arrears, higher legal costs, increased evictions and pressure on the vulnerable.

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SRCR 0018 Workforce INTERNAL RISK FUTURE RISK	The Risk that amidst an atmosphere of financial reductions and redundancies, the Hackney workforce become demotivated, leading to a negative atmosphere amongst workers, impacting upon service delivery and leading to dissatisfied stakeholders. Also that restructures may cause temporary loss in efficiency as officers are unsure of how new reporting arrangements, responsibilities and service provisions are put into practice. Knowledge could be lost with a large number of experienced staff taking redundancies. An additional organisational risk in this area is around the modernisation agenda and a need for the workforce to adapt and change and be receptive to new ways of working. Failure to do this could result in the Council lacking to dynamism to succeed in	Neighbourhoods & Housing	poodii	May 2018 – Risk has reduced with likelihood going down. A major (Senior Management) restructure has been long completed (with final interim arrangements ending in April 2017) whilst further ones have occurred (or are continuing). These are being carried out for a variety of reasons including improving team's organisational efficiency, adapting to new ways of working and also in some areas due to cuts to funding.

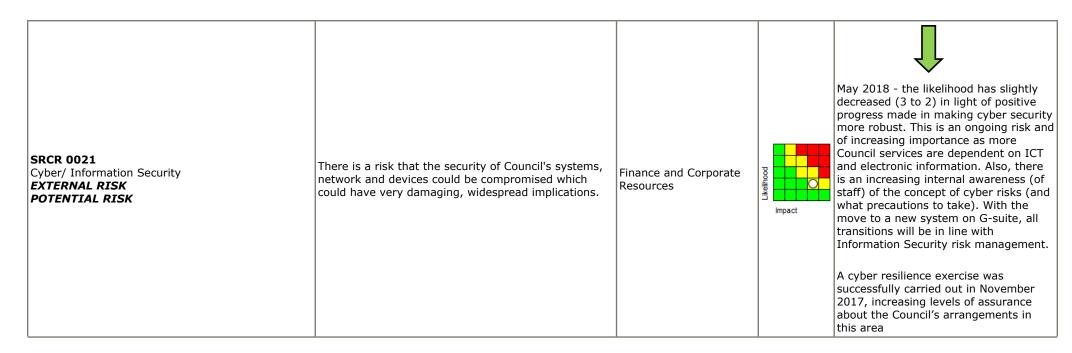
	effectively utilising opportunities open to it.			However, the new changes have generally been embedded effectively, so the likelihood of negative impacts to service delivery have reduced. Procedures documented so arrangements in place not to lose knowledge. The Council are currently switching over to G-suite, will result in increased efficiencies and dynamism, and the transition is being carefully managed by project teams overseeing a phased process. This should provassurances that teams will effectively adapt to the new ays of working, and reduce the likelihood of an organisational disruption.	
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SRCR 0018 Staff Motivation / Commitment	There are detailed HR procedures and processes to deal with all relevant areas (including problems/instability created by restructures) and these are carefully adhered to by teams involved. All communication is regular and carefully considered. Staff are well supported in adapting to new ways of working (whether from an IT or HR perspective).	Tim Shields	Dan Paul	31-Oct-2018	May 2018 – these controls are in place and continuing.

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SRCR 0018B Recruitment and Retention INTERNAL RISK CURRENT RISK	Services across the Council struggle to effectively and successfully recruit for certain positions, leading to a negative impact on service delivery. Also, with the Council needing an increasingly agile workforce (not constrained by traditional customs and practises), it may struggle to compete with other organisations to get the best candidates.	Chief Executive's; Children, Adults & Community Health; Finance & Corporate Resources; Neighbourhoods & Housing	Trikelihood Impact	May 2018 - Risk was recently broadened across the Council by HMT (from having been focused on ICT). Risk has dropped slightly with likelihood decreasing to 2, reflecting some positive progress made In a competitive market for skills the Council has experienced difficulties recruiting to a range of roles essential to delivery of services and planned service improvements (including ICT, Adult Social Care, Quantity Surveyors and Highway Engineers). This could impact seriously on the ability to develop and maintain effective service delivery due to difficulties with recruitment and retention. This is exacerbated by the recent changes to IR35, which is having the effect of driving skilled specialist workers to the private sector (as many ICT skills are transferable across sectors). However, there have been recent developments on this. Particularly with the completion of the first phase of the ICT restructure with senior positions having been successfully filled through a creative campaign, emphasising the benefit of Hackney as a place to work and also offering market supplements to ensure the organisation is able to be competitive with wages across the market. Overall, the Council has

	enjoyed some very positive results in terms of attracting high calibre candidates and filling many roles that were expected to be tricky. Therefore, there is now increased assurance that going forward, this risk can be effectively managed.
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SRCR 0018B Recruitment and Retention	Service are continuing to work with HR / OD to carry out the following suggested mitigations: - review recruitment strategy and identify other measures which can be taken to promote Hackney Council as a great place to work in technology and attract high quality candidates - review salary supplements to ensure that these are providing market competitive salaries and are also fair and transparent - review career development paths within the service and also ensure that apprenticeships / graduate trainee opportunities are being used effectively to develop internal talent.	Tim Shields; Ian Williams; Kim	All Service Managers	20-Oct-2018	April 2018 – This has been ongoing around the Council, and these proposed controls have been implemented (with success). The recent update to the Council's salary supplement scheme reflects the requirements of Services to compete in the open market and is working successfully. All roles are now benchmarked against the market, in line with the new Council salary supplement scheme. A prototype for an improved approach to recruitment advertising has been tested over the last year, and this will be reviewed ahead of recruitment arising from the restructure.
FR DR 007 A Training and development	Training and development needs for all staff have been captured from yearly appraisals and 1-2-1 documents. All HR procedures are followed correctly to ensure staff are valued and treated appropriately whilst at work. Where possible acting up and secondment opportunities are made available to staff. This helps contribute to an improved experience of working at Hackney and to an extent, mitigates the risks of absences and departures.	Tim Shields; Ian Williams; Kim Wright; Anne Canning		28-Oct-2018	Control reviewed and amended April 2018. If all these processes are followed, (with staff having opportunity for improved professional development) that should lead to a greater assurance that this risk won't materialise.

Risk Title Description of Risk	Directorate Current Risk - Latest Note
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Control Title	Control Description	Responsible Officer	Service Manager	Due Date	Control - Latest Note
FR IT 0006a Ensure compliance with the PSN Code of Connection and other applicable standards (including the ICT security requirements for compliance with the NHS IGSoC).	Ensure that good security practice is reflected in the Council's technical architecture and operational practices, including annual PSN Code of Connection compliance assessment (supported by IT health check). This will be an ongoing annual activity (no fixed end date).	Rob Miller	Henry Lewis	Ongoing - annual	April 2018 – The PSN assessor has requested additional information before our Code of Connection renewal is confirmed. This is now being organised. (no substantive concerns have been identified).
FR IT 0006b Ensure that all users of the Council's systems and data take appropriate measures to protect these.	Ensure that the Council has effective policies, guidance, training and measures to enforce compliance for all users (including Members). This will be an ongoing activity (no fixed end date).	Rob Miller	Henry Lewis	Ongoing	April 2018 – Enhanced end-user training for information security and data protection is being developed as part of our

					preparation for the General Data Protection Regulation. On a national scale, attacks have recently been reported in the media and a reminder was issued to all staff about the need to take care when clicking on emails. Systems have also been checked to ensure that the specific patch which closes this vulnerability has been applied.
FR IT 0006c Ensure that all hardware and software is supported for security updates.	Ensure that infrastructure and application lifecycle management practices are in place and functioning effectively so that the Council's systems remain supported. This will be an ongoing activity (no fixed end date).	Rob Miller	Henry Lewis	Ongoing	April 2018: Priority updates have been completed in line with the PSN Code of Connection submission. The ICT Security Group are reviewing the processes for management of security patches and planned refresh of out of data software and hardware. This is ongoing as part of continuous maintenance and patching.
FR IT 0006d Plan for upgrade required to end use of Windows 7 ahead of the end of Microsoft support (January 2020).	Upgrading the Council's desktop environment is a major activity and this will require careful planning and preparation, as well as significant allocation of funding.	Rob Miller	Henry Lewis	14-Jan-2019	April 2018: This is currently on hold pending completion of more time critical upgrade and refresh work.

Risk Title Description of Risk Dia	11rectorate	Current Risk Matrix	Risk - Latest Note
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SRCR 0019 Information Assets INTERNAL RISK POTENTIAL RISK	The Council holds a wealth of information assets across its services. It is essential that this is managed in compliance with requirements such as the Data Protection Act, the NHS IG Toolkit and also the forthcoming General Data Protection Regulation (which has come into effect from May 2018). It is also essential that the Council is able to use these information assets effectively to commission and deliver high quality services, reduce costs and work in partnership with other agencies and providers. Failure to do so will result in negative impacts.		Impact	April 2018 – A programme of work is currently well underway to map the Council's information assets and store these in a register with responsibilities clearly defined. This will be critical for ensuring compliance with the GDPR. Mitigation of this risk, and harnessing the most of the significant opportunity presented by effective information management, is a joint responsibility across each service directorate and the corporate ICT service. At Hackney, these risks are currently overseen by the Information Governance Group (which meets quarterly). Also, the transition to G-suite will present challenges to all the Council's Information Assets, and is being managed accordingly.
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Control Title	Control Description	Responsible Officer	Service Manager	Due Date	Control - Latest Note
FR IT 0001a Information management	Ensure effective information management policy and processes are in place so that the Council meets the requirements of the Data Protection Act / other legal and regulatory compliance arrangements. Ensure that the Council's information assets are managed robustly and used effectively to provide insight and to integrate Council and partner services, and deliver the maximum benefit to residents and businesses. This will be an ongoing activity (no fixed end date).	Ian Williams	Rob Miller; Matthew Cain	01-Oct-2018	April 218 – the GDPR programme of work continues to be reviewed by a standing project board operating under delegation from Information Governance Group.
FR IT 0001b Compliance	IGSoC: compliance with the NHS IG Toolkit. Ensure that the Council meets the compliance requirements for the NHS IG Toolkit to enable information sharing and partnership working with the NHS.	Ian Williams	Rob Miller; Matthew Cain		April 2018: Current renewal of IGSoC compliance is complete.

	This will include requirements for services across Public Health and Social Care. This will be an annual activity (no fixed end date).				
FR IT 0001c EU General Data Protection Regulation: preparing for compliance from May 2018	Establish a programme of preparatory activity to support Hackney's compliance with the GDPR in good time for its introduction in May 2018. This will include changes to the Council's information management arrangements, data retention, privacy provisions and practise across all Council teams who handle people's personal information.	Ian Williams	Rob Miller; Matthew Cain	01-Oct-2018	April 2018 – the GDPR programme of work continues to be reviewed by a standing project board operating under delegation from the Information Governance Group.
FR IT 0001d Third party information sharing	Ensure that we can do business efficiently and seamlessly by having appropriate data sharing agreements in place. It will be critical to ensure that control requirements are assessed and the implications for Hackney users are clear and proportionate (eg. some third parties require controls that would excessively restrict the Council's use of systems and buildings etc, and these may be barriers to information sharing). This will be an ongoing activity (no fixed end date).	Ian Williams	Rob Miller; Matthew Cain	01-Oct-2018	Ongoing April 2018

Risk Title	Description of Risk	Directorate	Current Risk Matrix	Risk - Latest Note
SRCR 0020 Corporate ICT /Business Resilience INTERNAL RISK POTENTIAL RISK	(Risk that) the Council does not currently have a robust and tested corporate resilience plan in the light of a major incident affecting its business. There is also a risk that Business Continuity Plans across the Council's services do not accurately reflect the disaster recovery provision that is available. This could result in services not being able to invoke their continuity plans effectively due to incorrect assumptions.	Finance & Corporate Resources	Impact	It is essential for the Council to provide some assurance that we are suitably prepared to respond and adapt to incremental change and sudden disruptions. Clearly this could impact massively on our ability to effectively deliver services, so resilience is a critical part of future planning. April 2018 - Score has reduced from 20 to 15 as a result of likelihood dropping from 4 to 3. This is a reflection of the work that has taken place to improve resilience / DR provision. It is essential for the Council to provide some assurance that we are suitably

prepared to respond and adapt to incremental change and sudden disruptions. Clearly this could impact massively on our ability to effectively deliver services, so resilience is a critical part of future planning. A recent cyber resilience exercise was successfully carried out in November 2017.
DR provision is in place for critical systems and 1200 <i>myoffice</i> desktop sessions in the event of the main datacentre being unavailable.
Successful DR testing has recently taken place, providing assurance of overall resilience. A Business Continuity Management Group started regular meetings as of July 2017. The recent BA incident emphasises the importance of careful management within this area. Council wide revisions of all BC Plans has occurred.

Control Title	Control Description	Responsible Officer	Service Manager	Due Date	Control - Latest Note
SRCR 0020A Corporate Resilience Forum	A Corporate Resilience forum has been established and will take overall strategic lead reporting to HMT. However the specific ICT issues are still managed by ICT themselves.	Kim Wright	Cross Council	Ongoing.	From paragraph 1.1-1.2 of the CRF report: 1:1 The CRF oversees the development of all systems and processes for Emergency Planning, Business Continuity Pandemic Planning and Resilience within Hackney Council. 1:2 This group will also ensure that appropriate links are made to other stakeholders in relation to Emergency Planning and Resilience such as NHS, LFB, MPS, EA AND VCS.
FR IT 0003 Resilience of ICT systems / Disaster Recovery	Work is currently in progress to commission resilient hosting arrangements in the Council's Stoke Newington offices. This will provide the facility to restore critical systems (based on a previously agreed list of corporate priority applications) so that priority Council services will have access to their systems within 4 hours of a major	Ian Williams	Rob Miller, Henry Lewis	31-Oct-2018	April 2018 – Migration to G Suite has commenced and is expected to complete in the summer 2018. Options for cloud hosting of the Council website are under consideration and a

	outage with loss of data limited to 15 minutes (Recovery Point Objective). A test on 1 key application has already proved successful. It must be noted that this provision will not give instant seamless failover for these services - so Council services must ensure that their Business Continuity Plans include plans in the event that ICT systems are not available - other services whose systems are not included in the resilience provision must ensure that their Business Continuity Plans include plans for extended unavailability of their ICT systems.				decision is about to be made. Other systems will be reviewed on an ongoing basis as part of planned maintenance activity. The ICT business continuity plan has been reviewed, updated and signed off.
FR IT 003 NEW CONTROL Review of Business Continuity Plans across the Council's services.	The Corporate Business Continuity Manager is supporting service managers across the Council in carrying out a review of their Business Continuity Plans. This is designed to identify critical services and their continuity requirements, and will help ensure that their plans are based on accurate expectations of the provision available. It is planned to implement a rolling 18 month schedule of review for all the council's BCPs. This will be in place following the current review of BCPs across all services, which was completed by the start of 2018.	Business Continuity Team	Business Continuity Team	31-Oct-2018	April 2018 – Cross council, BCPs are being successfully completed adding to an improved assurance about resilience.

Risk Title Desc	scription of Risk		Current Risk Matrix	Risk - Latest Note
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SRCR 0023

FUTURE RISK

Person suffers significant harm, injury or death **EXTERNAL RISK** Children, young people and adults who use our care and support services are at higher than usual risk of harm, injury or death. If risks are not adequately assessed and protected a child, young person or adult could suffer significant injury or death attributable to the Directorate's failure to take appropriate safeguarding and risk management measures. Additionally, general members of the public or Hackney staff could suffer harm due to a lack of general health and safety measures being in place.

Children, Adults & Community Health





Update April 2018 – This remains a high risk, although the controls should provide strong assurance that we are well positioned to manage it.

Control Title	Control Description	Responsible Officer	Service Manager	Due Date	Control - Latest Note
CYP 006B Local Safeguarding Children Board (LSCB) reviewed and operating as an effective multi-agency forum.	The City & Hackney Safeguarding Children Board (CHSCB) has a remit to monitor safeguarding across all partner agencies, including the local authority.	Anne Canning	Rory McCallum	31 Oct - 2018	Update April 2018 – A range of measures have been put in place to ensure the CHSCB is operating as an effective multi-agency forum. There is an Independent Chair in place, defined governance arrangements, regular attendance from partners at Board and relevant sub / working groups and Hackney-specific self-assessment. CHSCB also maintains a risk register covering all key statutory requirements; these actions and progress are regularly reviewed through the CHSCB Executive and full CHSCB. The July 2016 Ofsted inspection rated the CHSCB as 'Outstanding.'
CYP 006D Ensure staff have the necessary skills to ensure risk and need are properly assessed	The Directorate as a whole understands areas of high risk and works together to mitigate risk in relation to individual children by joint training and development and joint monitoring of practices across the services.	Anne Canning	Sarah Wright	31 Oct - 2018	April 2018 - Ofsted inspectors noted in July 2016 that "When children are at immediate risk of harm, referrals are dealt with swiftly and children are seen to complete effective child protection enquiries. Appropriate decisions are taken when risk is identified to safeguard children."
CYP 006E Child Protection procedures in place	Children subject to Child Protection Plans and Looked After Children are visited in line with statutory guidance and care plans are monitored, updated and amended as appropriate. Children are to be seen alone.	Anne Canning	Sarah Wright	31 Oct - 2018	Update April 2018 - Ongoing, monitored through management oversight and audit, monthly, quarterly and annual performance reports, including statutory returns to DfE and by Child Protection Conference Chairs and Independent Reviewing Officers.
CYP 006F Risk assessing activities for young people	All activities directly provided and commissioned by the directorate must be subject to rigorous risk assessments. These follow a consistent format. Also, the internal health and safety team conduct assessments and provide advice to mitigate risks of harm to staff in the course of work.	Anne Canning	Pauline Adams	31 Oct - 2018	Update April 2018 - All providers of proposed activities, including the local authority, are required to submit a written risk assessment which is scrutinised and approved / not approved by the service area. Where a risk assessment is not approved, the activity is not able to proceed. Minimum ratios of adults to young people are required.

CACH AS 005 Validating the strength of controls in place through external review	An ADASS peer review into the effectiveness of Safeguarding in Hackney will be carried out in April 2018 to test the current controls in place and make recommendations on areas for improvement to help manage this risk.	Anne Canning	Simon Galczynski	31 Oct - 2018	The Peer Review is in April 2018 and an implementation plan based on the recommendations of the review will be developed April – May 2018.
CACH ASC 0005 Implementing a robust safeguarding approach across adult services	The City & Hackney Safeguarding Adults Board, with a newly appointed independent chair, is monitoring the refreshed strategy for safeguarding adults to ensure the delivery of the strategic outcomes which includes embedding learning from Safeguarding Adult Reviews into practice through policies and training.		Simon Galczynski	31 Oct - 2018	April 2018 – As a stand-alone risk / control, this would be lower than red, however in the overall context of the risk (especially relating to children), it remains red.

Risk Title	Description of Risk	Directorate	Current Risk Matrix	Risk - Latest Note
	The Council does not take advantage of the devolution powers on offer and therefore misses any potential benefits they could present. By not capitalising on this opportunity the Council could miss a genuine chance to increase revenues, streamline services and improve efficiencies.	Chief Executive's; Children, Adults & Community Health; Finance & Corporate Resources; Neighbourhoods & Housing	Likelihood	May 2018 - This has been mentioned at an earlier Audit Committee as being a good example of an 'opportunity' risk. The negative side of this lies in not capitalising on its potential. The opportunity is that by utilising the new powers / funding, savings and improved efficiencies occur, to the overall benefit of the Council. Hackney has already been at the forefront of taking part in a health and social care devolution. The integrated commissioning model which has now been approved by Cabinet and is well underway ensures that this innovative approach continues, and is evidence the opportunities are not being missed.

Control Title	Control Description	Responsible Officer	Service Manager	Due Date	Control - Latest Note
SRCR 0024 Devolution	Detailed talks (at Senior Management level) and preparation continue to ensure all are best prepared to take advantage of what devolution can offer.	Tim Shields; Ian Williams; Kim Wright; Anne Canning		01-Nov-2018	May 2018. This work is clearly ongoing, and evidence of its success can be seen in the recent Cabinet approval of Integrated Commissioning across the borough with CCGs. There is significant opportunity connected to this risk in that serious opportunities could be missed if we do not take advantage of it.

Risk Title	Description of Risk	Directorate	Current Risk Matrix	Risk - Latest Note
SRCR 0025 Contract Procurement and Management (especially in Housing Services). INTERNAL RISK CURRENT RISK	As a result of Contract Management not being carried out properly or with regard to agreed parameters, revenue is lost or charges are levied which are not justified, leading to a poor level of resident's satisfaction (and general negative reputational impacts), unjustified cost and time overruns. Poor procurement decisions could result in nonviable contracts being awarded to non-viable contractors.	Chief Executive's; Children, Adults & Community Health; Finance & Corporate Resources; Neighbourhoods & Housing	poor High and the second secon	May 2018 – Risk continues in light of the amount of investigation work currently ongoing. This risk is currently being acutely demonstrated by some of the work the Pro-active Fraud team is undertaking. A major investigation is well underway into external contractors and how their relationship with Housing Services (formerly Hackney Homes) has been managed, and whether the work actually completed accurately corresponds to the charges which have been levied. There are also new areas of concern where investigations are commencing. Also scrutiny is being applied to the quality and accuracy of their work. All this ultimately relates to the Council ensuring it gets the best deal for its money.

Control Title	Control Description	Responsible Officer	Service Manager	Due Date	Control - Latest Note
NH DR 007 Detailed Council guidance in place for Procurement, Partnership and overall Contract Management	There is detailed supporting guidance available for all elements of the procurement process, including detailed Risk Assessment tools and specialised Partnership guidance.	Rotimi Ajilore	Rotimi Ajilore	02-Oct-2018	May 2018 - ongoing
NH DR 007a Contract Specification in place	Contracts clearly define the requirements of the business.	Ajman Ali	Calvin Fisher	02-Oct-2018	May 2018 - Risk reviewed and updated.
NH DR 007b Tender Stage process followed	Robust tender process in line with EU procurement law and Council standing order s.	Calvin Fisher	Each Contract Manager	02-Oct-2018	May 2018 - Risk reviewed and updated.
	Restructure of Asset Management Team is based around the new contracts and clarity of responsibility for the contract managers in line with the contract manual.	Ajman Ali	Calvin Fisher		
NH DR 007c Contract Monitoring and Fraud Prevention	Key performance indicators in placed and used to manage the contracts.	Calvin Fisher	Contract Managers	02-Oct-2018	May 2018 - Risk reviewed and updated.
	Final accounts prepared in a timely manner.	Calvin Fisher	Contract		
	Regular contract audit / investigation	Michael Sheffield	Managers		

			Julie Sharp, Patrick Sanders Wright		
NH DR 007d Review of form of Contract	The Contract options are being reconsidered to ensure that the contract form is fit for Hackney's purpose.	Ajman Ali	Calvin Fisher	02-Oct-2018	May 2018 - Risk reviewed and updated.
SRCR 0025 Contract Procurement and Management (especially in Housing Services).	Major investigation is ongoing with dedicated team (Proactive Anti-Fraud Team) of 3 staff.	Ian Williams	Michael Sheffield	02-Oct-2018	Progress is confidential at this stage.

Risk Title	Description of Risk	Current Risk Matrix	Risk - Latest Note
SRCR 0027 Impact of the government reforms on education service delivery. EXTERNAL RISK FUTURE RISK	Government policy on the overall role of LAs, the academisation of schools and the role of LAs in school improvement reduces the LAs mediating role in the local schools system and its authority and capacity to provide leadership to the system.	celihood	March 2018 – The Hackney Schools Group proposal was agreed by Cabinet on 18 December 2017. Work is now underway to visit schools to ascertain their views on the proposed HSG which will be developed on the basis of a school-led improvement system. On-going staff engagement is important, and staff briefings will be utilised to ensure staff are informed of developments. The Risk Review Group recommends retaining the current risk rating as reflecting the scale of the current risk.

Control Title	Control Description	Service Manager	Control - Latest Note
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Control Title	Control Description	Service Manager	Control - Latest Note
SRCR 0027A Development of an alternative service delivery model that provides a governance structure for the local schools system.	An alternative model for the governance of the Hackney school system is developed that retains the capacity for the strategic provision of school improvement and enables the continuation of a local mediating layer.	Anne Canning; Frank OʻDonoghue	March 2018: A series of discussions and papers to the Lead Member, Mayor, Labour Group and Cabinet (on 18 December 2017) resulted in approval of a proposal to engage with schools on the establishment of a new Schools Group for maintained schools, community and voluntary aided, associated where possible with academies and free schools. The Schools Group would take a greater role in the leadership of the schools system as the role of the local authority reduces. Engagement with schools will take place in the spring term 2018.
SRCR 0027B Staffing challenges – Developing a strategy that retains staff with key skills knowledge and ability; identifying new talent and encouraging people to work for HLT.	The risk of being unable to retain talented people over time is a challenge in this context. HLT will need to retain current employees through maintaining improvement capacity through trading; identifying and encouraging new talent through succession planning and promoting a more resilient and adaptable culture for long serving staff to meet the new challenges we face.	Anne Canning; Olly Cochrane	March 2018: Limited academisation means continued support for maintained schools and limited staff turnover, particularly for school oversight and support, and the provision of school improvement as traded services or as 'maintained' school support. The learning and development programme promotes succession planning and the organisational development programme is focused on resilience and change management.
LT 1718 Risk 01 Recruitment of permanent Head of HLT	The ongoing uncertainty around the future education system in Hackney makes it difficult to recruit a permanent Head of HLT. Not having a permanent Head of HLT is a risk to the long-term viability of Hackney Learning Trust.	Anne Canning; Olly Cochrane	March 2018: Interim arrangements continue, minimising risk to the organisation.

Risk Title	Description of Risk	Current Risk Matrix	Risk - Latest Note
Escalating SEND spend has an adverse	The number of pupils eligible for SEN statements continues to increase at a significant rate exceeding the population growth in the Borough, the effect of which is to place the SEND budget in deficit.	pooley	March 2018 –Risk Review Group recommends retaining the highest risk rating as it reflects the severity of the risk. The risk remains at this level because of the combined effect of the council not receiving any additional funding over many years in spite of a dramatic increase in pupil numbers, combined with difficulty in reducing provision for pupils with existing support plans and transport. The

	prospect for immediate budget reductions is restricted because of the time taken for fundir changes to be implemented and the limited control over aspects of the cost.	ng
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Control Title	Control Description	Service Manager	Control - Latest Note
SRCR 0028 a Risk 02 The action plan to address SEND budget pressure and reduce overspend is in place and its effectiveness is regularly monitored by SLT.	SLT has approved an action plan to address the pressures placed on the SEND budget by increasing numbers of children and young people being eligible for SEN statements. This action plan introduces new oversight and challenge into the process, with a view to controlling expenditure and making sure resources are distributed fairly.	Anne Canning; Andrew Lee	March 2018: The report on the consultation to introduce Additional Funding has yet to be finalised. There have been significant objections to the 'additional' and 'exceptional' funding plans Negotiations with the 3 special schools are in progress. Monthly meetings review the wider action plan of which the above 3 actions form key components. The current action plan is unlikely to bring about the 'savings' at the scale and timeframe required. It is likely that significant strategic decisions on how to manage SEND funding going forward will need to be made politically and/or at highest officer level.
SRCR 0028 b Risk 06 - Management of financial impact of SEND budget pressures.	Rapid, significant short term reductions in SEND costs and outlays will be difficult to achieve. Ensuring that the policy changes in the action plan result in medium term cost savings that relieve the pressures on the SEND budget, whilst ensuring the operational effectiveness of HLT is not detrimentally affected by the overspend, is imperative.	Anne Canning; Yusuf Erol	March 2018: This continues to be the most significant risk to HLT's financial viability. The policy changes mentioned in the June update have proved to be difficult to implement. There has also been limited progress made on the further savings agreed by SLT. As a result of this, HLT continue to rely on reserve funding which is an unsustainable position.
SRCR 0028 c Risk 07 - Changing the culture of SEND in schools and HLT to implement the action plan.	If the action plan is to control expenditure and distribute resources fairly, changes in the existing culture in HLT teams and schools must also change to critical assessment and the equitable distribution of limited resources. Collaborative working with schools will be necessary to ensure pupils SEND needs are met from delegated SEND resources, with EHCP referral only for exceptional needs.	Anne Canning; Andrew Lee	March 2018: Workshops on provision management are being offered to all schools to reinforce the message that there is an expectation that schools must demonstrate how they have used and reviewed their use of Element 2 prior to requesting element 3 funding. This will be reflected in Panel response letters. Sources and rates of requests for element 3 funding will be published on the Local Offer. The distribution of pupil with EHCPlans in schools will also be published.

Control Title	Control Description	Service Manager	Control - Latest Note
SRCR 0028 d Risk 08 – The initiation of EHCP assessments is rigorously reviewed	The decision to initiate assessments needs to be rigorously reviewed to ensure the level of support is appropriate and sustainable. This may include senior managers signing off decisions, or refusing to do so.	Anne Canning; Andrew Lee	March 2018: The role of the Panel is to be reviewed, revised and publicised in the light of the move to focus on robust examination of Provision management arrangements. Headteachers need to continue to be key members of the panel. The moderation exercise involving other local authority representatives will continue once a term. Data from each panel is to be reviewed on a monthly basis using the SEND Monthly Dashboard. An annual report summarising this data is to be published on the local offer
SRCR 0028 e Risk 09 – The costs of providing ECHPs is born equitably across agencies	All agencies need to contribute to the costs of the Education & Health Care Plans through the joint commissioning budget.	Anne Canning; Andrew Lee	March 2018: A joint commissioning/pupil funding panel is being established across the partnership to ensure all agencies contribute to the cost of Plans where appropriate.

SRCR 0029 Serious Safeguarding failure in regard to pupils not in school EXTERNAL RISK FUTURE RISK Safeguarding onsiderations for those pupils who are not registered at a school place attending unregistered settings, children missing from education, children attending unregistered settings, children who are yet to be allocated a school place etc is increasing in importance. This is the particular focus for current Local Authority Safeguarding Inspection frameworks, and there is an expectation that HLT must work to ensure the safety and wellbeing of all such pupils, challenging existing legislative frameworks and guidance where necessary to do so, and working with partners to ensure effective and robust identification, tracking, consultation and referral. March 2018 – The CYP Scrutiny Commission report into Unregistered educational settings has been published with recommendations that relate to Elective Home Education and safeguarding. HLT/LBH notes the disputed advice between the DTE and Ofsted as to whether appropriate powers are available to Ofsted to intervene and the fulfilling its safeguarding role & responsibilities with these settings. Risk Review Group notes that this presents a very high reputational risk for the borough, although given the limited statutory powers, the Council has limited options to mitigate this risk. We recommend that the risk rating remains unchanged to take account of this.	Risk Title	Description of Disk	Current Risk Matrix	Risk - Latest Note
	Serious Safeguarding failure in regard to pupils not in school EXTERNAL RISK FUTURE RISK	Electively Home Educated pupils, children missing from education, children attending unregistered settings, children who are yet to be allocated a school place etc is increasing in importance. This is the particular focus for current Local Authority Safeguarding Inspection frameworks, and there is an expectation that HLT must work to ensure the safety and wellbeing of all such pupils, challenging existing legislative frameworks and guidance where necessary to do so, and working with partners to ensure effective	Impact	report into Unregistered educational settings has been published with recommendations that relate to Elective Home Education and safeguarding. HLT/LBH notes the disputed advice between the DfE and Ofsted as to whether appropriate powers are available to Ofsted to intervene and the difficulties this places on the Council in terms of fulfilling its safeguarding role & responsibilities with these settings. Risk Review Group notes that this presents a very high reputational risk for the borough, although given the limited statutory powers, the Council has limited options to mitigate this risk. We recommend that the risk rating remains

Control Title	Control Description	Service Manager	Control - Latest Note
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Control Title	Control Description	Service Manager	Control - Latest Note
SRCR 0029A Safer Recruitment and Safeguarding training offered to schools and governing bodies- Traded	School governing bodies are responsible for ensuring that school staff have completed the relevant safeguarding training. The HLT Wellbeing and Education Safeguarding Team provide training through CPD package. The latest version of DfE guidance 'Keeping Children Safe in Education (September 2016) states that the school staffing regulations require governing bodies of schools to ensure that at least one person on any appointment panel has undertaken safer recruitment training. From September 2014 (and subject to parliamentary procedure) schools may choose appropriate training and take advice from CHSCB in doing so. HLT Safeguarding Team has an approved list of training providers, to compliment the resource currently available to schools. The HLT Quality and Assurance Training officers will ensure that all future training packages incorporate all relevant aspects of the new DfE guidance.	Manager Anne Canning; Paul Kelly ment March 2018 – S Safeguarding tra traded service to date, the take up positive. March 2018 – H Safeguarding For Partnership work The Safeguarding advice and guida legislation, Serio New and refresh information and schools and setti Leadership Upda Officer from the Team is working community group proposal for spectorough. Sarah M HLT has represel working on commonistently raise to independent a Hackney. March 2018: The worked to identif in monitoring the arrangements. A	March 2018 – Safer recruitment and Safeguarding training continues to be offered as a traded service to schools and governing bodies. To date, the take up by schools of this offer has been positive.
SRCR 0029B Information sharing activities in place.	HLT are represented on local Safeguarding Boards at all levels, and work proactively across 1CYPS by contributing to all safeguarding forums and initiatives, subject to capacity. HLT are also engaged on other partnership panels where safeguarding is a concern, such as MATs and Children and Young Peoples partnership panel. The HLT contributes to all reviews as required by the Safeguarding Board, and implement all actions. HLT's membership of the Ofsted Preparation Group for Ofsted inspections provides the opportunity to establish and use linkages to share information. HLT disseminates to schools briefings based on the findings of Serious Case Reviews. All published SCRs have been shared at Head teacher termly briefings, and with Schools and Settings after discussion and agreement with HLT SLT.	Canning;	March 2018 – HLT is represented at all relevant Safeguarding Forums and engages extensively in Partnership working. The Safeguarding in Education Team provides advice and guidance to schools on all training, legislation, Serious Case Reviews etc. New and refreshed safeguarding guidance, CHSCB information and newsletters are disseminated to schools and settings through HLT's Bulletin and Leadership Updates. Officer from the HLT Safeguarding in Education Team is working with the CFS and relevant community groups re: a Strategic Safeguarding proposal for specific communities within the borough. Sarah Wright is leading on this. HLT has representation at the LBH Officer Group working on community engagement. HLT has consistently raised safeguarding concerns related to independent and unregistered settings in Hackney.
SRCR 0029C Monitoring of Safeguarding and Safer Recruitment issues through SRAS process	Oversight of any concerns picked up through SIP visits and SRAS process used to inform interventions and support provided to schools	Canning;	March 2018: The School Improvement team has worked to identify strategies to support governors in monitoring their own safeguarding arrangements. A Safeguarding SEF Audit has been issued to schools with the recommendation that it is completed annually and reported to governors.

Control Title	Control Description	Service Manager	Control - Latest Note
	Raising awareness of e-safety strategies, within the broader context of child protection/safeguarding – link to S11 audits	Anne Canning; Paul Kelly	March 2018 – Online Learning Policies for Primary/Early Years settings, and Secondary schools have been disseminated to the Borough's schools and settings.

Risk Title	Description of Risk	Directorate	Current Risk Matrix	Risk - Latest Note
SRCR 0030 Pressures on Temporary Accommodation INTERNAL RISK CURRENT RISK	The demand on temporary accommodation (TA) for homeless households exceeds the supply of property suitable for use, and also causes a clear shortfall between the subsidy provided and the actual cost of meeting TA need. This could result in serious difficulties in providing an effective provision for the accommodation of vulnerable children and adults, and also impact adversely on available budgets.	Resources	Impact	May 2018 – Local authorities have a statutory duty to provide accommodation for homeless households that have been defined as being in priority need and unintentionally homeless, and are obliged to secure temporary accommodation (TA) for that household as an interim measure whilst a longer-term alternative becomes available. Councils in Britain have spent more than £3.5bn on temporary accommodation for homeless families in the last five years, with the annual cost rising 43% in that time. The Local Government Association has commented that these costs are "unsustainable". It should be noted that the Homelessness Reduction Act (implemented in April 2018) will drive further demand for TA provision. The Act decisively modifies and extends existing homelessness protection. Additionally, Benefits and Housing Needs are forecasting a 15% increase year on year of households in temporary accommodation, so it is always increasing. Risk score remains the same. There will be another change of legislation within the Homelessness Reduction Act in October 2018, so there will be a further review then.

Control Title		Graiin Director	Service Manager	Due Date	Control - Latest Note
1 3	Utilise 100% of all regeneration voids as additional temporary accommodation reducing the need for costly nightly paid TA provision.	Ian Williams	Jennifer Wynter	31-Oct-2018	Control ongoing May 2018
provision of discharge of	Additional duty afforded LA's to discharge our homeless duty with provision of an affordable 1 year monthly PRS let, albeit if further homelessness within 2 years we retain the duty. TA strategy in place and agreed way forward with Mayor & Members on OOL placements.	Ian Williams	Jennifer Wynter	31-Oct-2018	Control ongoing May 2018

on nightly paid	Maintain influence on the rental market by continued observation and no breaches (except emergency disabled accommodation) of the agreed Pan London TA rent cap.	Ian Williams	Jennifer Wynter	31-Oct-2018	Control ongoing May 2018
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Risk Title	Description of Risk	Directorate	Current Risk Matrix	Risk - Latest Note
SRCR 0031 NEW RISK Fire Safety INTERNAL RISK FUTURE RISK	As a result of inadequate fire safety measures or defective workmanship (on cladding installation for example), death and serious injury occur from fire in LBH managed properties.	Neighbourhoods & Housing	Impact	In the light of the Grenfell tragedy and the increased focus on materials / workmanship on Council properties nationally, this risk was immediately escalated to Directorate and Corporate level. There were always Fire Safety risks on Housing registers, but recent events and understandable sensitivities necessitated this being featured at the highest level. As the controls below demonstrate, detailed work is taking place – and this has always been the case in terms of this threat. As a result of the tragedy however, extra focus and scrutiny is now been applied to all elements of fire safety in the Borough and there is certainly no complacency as to the situation. The Borough has to be receptive to new recommendations and lessons learnt emanating from Grenfell. However, the controls below and accompanying notes should provide some strong assurance that the risks are being managed. This risk focuses solely on risks of an incident in blocks managed by the Council. However, the Council also has limited responsibilities in relation to housing association and privately owned blocks in the borough. An incident in one of these blocks is also a risk to the Council, though obviously we have in place measures to meet the Council's responsibilities. The DCLG is currently trying to add new burdens on LAs in relation to privately owned blocks.

Control Title	Control Description	Responsible Officer	Service Manager	Due Date	Control - Latest Note
SRCR 0031a Fire Risk Assessments	Complete new Fire Risk Assessments (circa 1,800) for all of our stock in order to provide reassurance to residents. Ensure that these new Fire Risk Assessments (FRA) are undertaken by suitably qualified assessors and that the assessments they produce meet strict quality standards. All fire safety findings/recommendations coming out of the new FRAs are implemented within the allotted timescale (P0 = immediately; P1 = within one month; P2 = within 6 months; P3 = within 12 months; P3+ = next refurbishment). Publish all new Fire Risk Assessments on the Council's website.	Tim Shields; Kim Wright	Ajman Ali	15 Oct 2018	Internal interim fire risk assessors have been appointed and we are in the process of appointing 5 permanent fire risk assessments to carry out Type 3 Fire risk assessments across all domestic properties. Head of resident safety appointed and in the process of recruiting a fire assessment project team and a risk and compliance team. This team will provide advice on fire safety across Housing Services and provide quality

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					assurance of all fire risk assessments. Type 1 FRA's have been completed in 1823 properties and 80% of the high priority actions have been completed, 57% of medium priority have been completed. A programme for reviewing all Fire risk assessment is ongoing and type 3 fire risk assessments are being carried out over a four year programme. All FRA type 1 have been published.
SRCR 0031b Fire Safety	Establish dedicated fire safety groups for the various work streams covered by the Corporate Fire Safety Group's terms of reference and ensure that they have agreed work plans and are delivering them.	Kim Wright	Ajman Ali	15 Oct 2018	Fire safety focus group is in place and continues to monitor fire safety within Housing Services. Corporate actions have now been embedded in services as business as usual.
SRCR 0031c Fire Safety – high risk blocks	Implement the key findings and recommendations from the new FRAs that have been/will be undertaken across all of our high rise blocks. Blocks to be assessed in priority based on a risk-based Forward Plan (scissor blocks first). Carry out additional non-FRA inspections across our high rise blocks in order to provide a visible presence across the Borough. Carry out any other ad hoc fire safety inspections that are required.	Kim Wright	Ajman Ali	15 Oct 2018	Type 1 FRA's have been completed in 1823 properties. A programme for reviewing all Fire risk assessment is ongoing and type 3 fire risk assessments are being carried out over a four year programme. The new neighbourhood housing model ensures that inspections are being carried out regularly. Housing Officers have been recruited who carry out inspections of blocks on a regular basis including any issues relating to fire.
SRCR 0031e Fire Safety – everyone's responsibility	Develop and implement a communications strategy that, amongst other things, communicates the need to residents to take responsibility for fire safety in their area and also that we have taken all necessary action to keep them safe from the risk of fire, (b) ensure effective communication and engagement with tenant representatives, (c) manage communications with Members so that they are engaged and up to speed with the work that we are doing but we are not distracted from the work that we are doing, (d) keep staff up to speed with developments, (e) respond quickly to press enquiries.	Kim Wright	Ajman Ali / John Wheatley	15 Oct 2018	Communications strategy in place and regular meetings with Resident Safety are held to ensure the council is actively engaged with residents and that residents are aware of their obligations to co-operate with fire safety control measures. All sites have been assessed for accessibility and LFB are still carrying out regular inspections of blocks and providing advice. We are working with LFB ensuring that they have easy access to our estates in the event of fire.

Control Title	Control Description	Responsible Officer	Service Manager	Due Date	Control - Latest Note
SRCR 0031f LFB meetings	Develop robust arrangements for meeting regularly with the London Fire Brigade (LFB) to consider fire risk assessments and safety on our estates.	Tim Shields; Kim Wright	Ajman Ali	15 Oct 2018	Regular formal quarterly meetings being held with LFB and the Director or Housing and Resident Safety. Regular communication between LFB fire safety officer and Head of Resident safety Corporate fire focus groups in place monthly.
SRCR 0031g Fire safety policy	 Based on the lessons learnt from the fire safety response work undertaken since Grenfell, undertake a series of policy reviews and develop a set of proposal papers that will enhance the way that the Council undertakes fire safety management across the Borough. This will include: Agreement on the new corporate Fire Safety Policy and the development of a new fire strategy with Council professionals, residents and industry experts. Flat Front Doors: Analysis of the recommendations coming out of the most recent FRAs, current policy guidelines and agreeing a strategy for dealing with them. Leaseholder Obligations/Requirements: This will cover a number of areas, including (a) ensuring that leaseholders are providing evidence that they are meeting their fire safety obligations, (b) developing a policy on how we ensure that all leaseholder front doors are 30 minute fire resistant, (c) developing a policy on allowing or requiring leaseholders to be included in communal safety works and inspections, e.g. gas safety or sprinkler or alarm installation; at their cost. Sprinklers: Developing a policy position on the retrofitting of sprinklers. Our current policy and procedures for dealing with fire risks in communal areas (e.g. storage of combustible materials, blocking of escape routes. Enhanced parking enforcement on our estates. Responding to any recommendations coming from the Grenfell enquiry. Budget Management: Ensure that the necessary resources are in place to undertake all of the work coming out of the new FRAs. Establish "asks" of the government with respect to resourcing additional fire safety work and related costs, wider building regulation and perhaps industry with respect to cladding and sprinkler systems. 	Tim Shields; Kim Wright	Ajman Ali	15 Oct 2018	Policy has been reviewed and is currently under consultation Budget Management: Analysis is taking place of the likely costs of the recommendations coming out of 1,800 new FRAs and how much can be phased/built into planned programmes. This will be prioritised in the HRA Business Plan. The update report went to Cabinet in March 2018, and the previous September (2017) and this provided thorough updates.

Risk Title	Description of Risk	Directorate	Current Risk Matrix	Risk - Latest Note
SRCR 0032 NEW RISK Integrated Commissioning INTERNAL RISK CURRENT RISK	As a result of a loss of direct control over some of the Council's social care and public health budgets, elements of the new service delivery are compromised and don't prove as effective as initially envisioned. Also, the impact of managing and resourcing additional governance structures (and adapting to them) would need to be addressed; and if it fails to be, the effectiveness and transparency of the process will be compromised.	Community Health	Impact Impact	Of course, Integrated Commissioning also presents numerous opportunities. If it continues to become effectively embedded within the organisations, it could offer a clear way of offering a more joined up and comprehensive way of working together. Health and social care partners across Hackney share an ambition to improve health outcomes for local people by commissioning these services in a more integrated way that makes the most of our shared investment at a time when public funding has experienced serious reductions and increasing budgetary pressures. Therefore, there could be clear financial benefits.

Control Title	Control Description	Responsible Group Director / Officer	Service Manager	Due Date	Control - Latest Note
SRCR 0032a The ICB	The Integrated Commissioning Board is tasked with developing risk identification, monitoring and mitigation arrangements in line with the corporate approach. There are detailed schemes of delegation agreed between the separate bodies specifying exactly what individual and shared duties are.	Anne Canning		31-Oct-2018	Regular meetings (with accompanying minutes) of the ICB should provide assurance of effective communication between the organisations. The most recent meeting was on 15 November 2017, and full minutes and records are kept for all meetings.
SRCR 0032b Section 75	The Section 75 Agreement including the financial framework sets out: - Scope of pooled and aligned budget; - Ground rules for its use and treatment of overspends; and - How conflicts in budget-setting priorities would be settled. The Section 75 Agreement also sets out the risk share agreement; should there be an overspend, the party with statutory responsibility for the	Anne Canning		31-Oct-2018	The Section 75 Agreement will be for a 2-year period with a break clause on 9 months' notice. This will ensure that the Council is able to withdraw from these arrangements if they have concerns. The budget and approach will be negotiated and

	function or budget will be responsible.				agreed each year to reflect changing circumstances.
SRCR 0032c Ensuring effective governance	Ensure all arrangements and structures are properly organised and that the governance is sound.	Anne Canning	31-	1-Oct-2018	A meeting was held with the partners and external auditors in January 2017. The external auditors provided assurance that the proposed arrangements were in line with guidance.

Risk Title	Description of Risk	Directorate	Current Risk Matrix	Risk - Latest Note
SRCR 0033 Inaccurate or Late Pay Information Supplied to Hackney Pension Fund (LGPS)/Local Pensions Partnership (LGPS)/Teachers Pensions	Inaccurate payroll data supplied to the Hackney Pension Fund introduces the following risks: • Fund actuary unable to properly assess funding position – Council contributions rise as a result • Inaccurate member pension records – potential under/overpayment of benefits and potential for claims against the Council. • Enforcement action against the Council by the Pensions Regulator • Reputational risks Inaccurate payroll data supplied to the Local Pensions Partnership introduces the following risks: • Inaccurate member pension records – potential under/overpayment of benefits and potential for claims against the Council. • Reputational risks • Costs recharged to the Council as a result of enforcement action against LPP by the Pensions Regulator Inaccurate payroll data supplied to Teachers Pensions introduces the following risks: • Inaccurate member pension records – potential under/overpayment of benefits and potential for claims against the Council. • Reputational risks • Enforcement action against the Council by the Pensions Regulator	Chief Executive's - HR	pooling impact	Reviewed May 2018 – the likelihood of this risk remains very high. Significant problems with the payroll data being provided by the Council has meant that the quality of membership data has deteriorated since the introduction of the 2014 scheme. The complexity of the scheme has increased significantly and the Council's payroll provider has been unable to respond to these changes, resulting in consistently poor provision of vital data across the Fund's largest employer. A new payroll system was introduced in July 2017; however, significant changes to processes are still bedding in and the long term impact of the new system is therefore difficult to determine.

Control Title	Control Description	Responsible Officer	Service	Due Date	Control - Latest Note
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SRCR 0033 A Monitoring of membership data	Controls – annual monitoring of membership records, valuation checks, external data validations	Michael Honeysett/Dan Paul	Lorraine Robinson/Rachel Cowburn/Julie Stacey	31-Dec- 2018	Reviewed May 2018 - ongoing.
SRCR 0033 B Contributions monitoring	Monthly monitoring of contributions to ensure that employers paying across correct contributions along with membership data being supplied	Michael Honeysett/Dan Paul	Lorraine Robinson/Rachel Cowburn/Julie Stacey	31-Dec- 2018	Reviewed May 2018. Good communication with payroll, as accurate data is very important.
SRCR 0033 C Performance Monitoring	Service Level Agreement with external administrator and monthly monitoring of contract. Monitoring of employers and Pensions Administration Strategy which enables Fund to recoup additional administration costs for sub-standard performance.		Rachel Cowburn/Julie Stacey	31-Dec- 2018	Reviewed May 2018
SRCR 0033 D New Payroll Implementation	Consistent involvement in the implementation and development of the Council's new payroll system (Go live date - July 2017). The Council's payroll supplies data for the vast majority of the Fund – the Fund's involvement with the implementation helps ensure the importance of good quality pension reporting is recognised	Michael Honeysett/Dan Paul	Lorraine Robinson/Rachel Cowburn/Julie Stacey	31-Dec- 2018	Reviewed May 2018

Risk Title	Description of Risk	Directorate	Current Risk Matrix	Risk - Latest Note
FR DR / AAF 015 Major fraud not identified NEW RISK INTERNAL RISK FUTURE RISK	The Council's response to a serious fraud is inadequate because either – (1) Management do not have adequate arrangements in place to identify irregularity in their service area; (2) Concerns are identified but they are not reported to AA Fin accordance with the Anti-Fraud & Corruption Strategy; or (3) There is a failure in the investigation process. Any of the above could result in financial loss, severe reputational damage and an avoidable drain on resources through taking action to fix the problem. A failure to investigate a case in compliance with the prescribed legislation and Anti-Fraud & Corruption Policy could lead to damaging accusations against the Anti-Fraud Service and the possible prosecution of innocent parties or failure to prosecute fraudsters, which would negatively impact on the Council's reputation.	Finance & Corporate Resources and Cross Council		March 2018 - No single management or audit control is likely to completely mitigate against a serious fraud, instead the overarching control environment must function effectively. Hackney has invested in its Audit and Anti-Fraud resources which has led to some notable recent achievements to prevent and minimise the impact of fraud.

Control Title	Control Description	Responsible Officer	Service Manager	Dua Data	Control - Latest Note
FR AAF 015A – Cross organisation	Fraud doesn't recognise geographical boundaries and the Council's approach to	Cross Council	All relevant	1 June 2018	March 18 -

working & proactive approach of managers.	fraud equally relies upon robust working arrangements between other organisations, including the police, OLAs, Cabinet Office (NFI), Borders Agency, HMRC etc) SLAs are in place with RSLs. Also all managers need to be aware of their duties regarding suspicious activity, and how to comply with the Council's overall approach.	/ Partnerships	managers		ongoing.
FR AAF 015B – Robust Policy framework	The Council has in place a number of key policy documents setting out the Council's approach, standards and expectations when dealing with suspected fraudulent activity. These include: • Anti-Fraud and Corruption Strategy • Whistleblowing Policy • Codes of Conduct (staff and members) • Anti-Money-Laundering Policy • ICT policies & procedures • Financial Procedure Rules These are reviewed on a regular basis. In addition, Audit and Investigations teams have policy and procedure documents which map the specific methodologies with which they carry out their work.		Michael Sheffield; Julie Sharp	1 June 2018	March 18 – ongoing.
FR AAF 015C – Communication and awareness	Communication, both internally between teams and externally with other partners is crucial in developing a clear overall picture. This occurs through meetings and joint visits. If procedural issues are identified thorough AAF reviews, they are reported as widely as necessary within Hackney. Staff induction stresses requirement to comply with Code of Conduct. Particularly close links are maintained between investigators and service areas that are targets for fraudsters, for example, housing, NRPF, contracts, etc. Specific high risk areas have received bespoke training. Notable investigation successes are reported to Committee and are advertised through the Comms team.		Michael Sheffield; Julie Sharp	1 June 2018	March 18 – ongoing.
FR AAF 015D – Approach and training.	Teams maintain a rigorous approach to their investigations, operating a clear system of diligently reviewing evidence and feeding back through the reporting framework. Performance in key areas is regularly reported to a senior level within the Council, including the Audit Committee. Investigators are all qualified or undergoing professional training. Team procedures are in place and casework is regularly reviewed and monitored by senior members of the team. Additional training is provided if a need is identified.		Michael Sheffield; Julie Sharp	1 June 2018	March 18 – ongoing.