



**Resources Department
Town Hall, Upper Street, London, N1 2UD**

AGENDA FOR THE AUDIT COMMITTEE AND AUDIT COMMITTEE (ADVISORY)

Members of the Audit Committee and Audit Committee (Advisory) are summoned to a meeting, which will be held in Committee Room 4, Town Hall, Upper Street, N1 2UD on, **11 July 2023 at 7.00 pm.**

Enquiries to : Boshra Begum
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Despatched : 3 July 2023

Membership

Councillor Nick Wayne (Chair)
Councillor Flora Williamson (Vice-Chair)
Councillor Janet Burgess MBE
Councillor Sara Hyde
Alan Begg (Co-Optee)
Alan Finch (Co-Optee)

Substitute Members

Councillor Angelo Weekes
Councillor Jilani Chowdhury
Councillor Jason Jackson
Councillor Jenny Kay

Quorum: is 3 Councillors

A. Formal Matters **Page**

1. Apologies for Absence
2. Declaration of substitute members
3. Declarations of interest

If you have a **Disclosable Pecuniary Interest*** in an item of business:

- if it is not yet on the council's register, you **must** declare both the existence and details of it at the start of the meeting or when it becomes apparent;
- you may **choose** to declare a Disclosable Pecuniary Interest that is already in the register in the interests of openness and transparency.

In both the above cases, you **must** leave the room without participating in discussion of the item.

If you have a **personal** interest in an item of business **and** you intend to speak or vote on the item you **must** declare both the existence and details of it at the start of the meeting or when it becomes apparent but you **may** participate in the discussion and vote on the item.

***(a) Employment, etc** - Any employment, office, trade, profession or vocation carried on for profit or gain.

(b) Sponsorship - Any payment or other financial benefit in respect of your expenses in carrying out duties as a member, or of your election; including from a trade union.

(c) Contracts - Any current contract for goods, services or works, between you or your partner (or a body in which one of you has a beneficial interest) and the council.

(d) Land - Any beneficial interest in land which is within the council's area.

(e) Licences - Any licence to occupy land in the council's area for a month or longer.

(f) Corporate tenancies - Any tenancy between the council and a body in which you or your partner have a beneficial interest.

(g) Securities - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

This applies to **all** members present at the meeting.

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B. Items for Decision **Page**

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3.	Anti-Fraud and Corruption Policy	61 - 78
4.	Employment Tribunal Outcomes	79 - 82
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6.	Annual Governance Statement	

C. Urgent non-exempt items

Any non-exempt items which the Chair agrees should be considered urgently by reason of special circumstances. The reasons for urgency will be agreed by the Chair and recorded in the minutes.

D. Exclusion of press and public

To consider whether, in view of the nature of the remaining item on the agenda, it is likely to involve the disclosure of exempt or confidential information within the terms of the Access to Information procedure rules in the Constitution and, if so, whether to exclude the press and public during discussion thereof.

E. Confidential/exempt items

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F. Urgent exempt items (if any)

Any exempt items which the Chair agrees should be considered urgently by reason of special circumstances. The reasons for urgency will be agreed by the Chair and recorded in the minutes.

The next meeting of the Audit Committee and Audit Committee (Advisory) will be on 18 September 2023

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London Borough of Islington

Audit Committee and Audit Committee (Advisory) - 23 May 2023

Minutes of the meeting of the Audit Committee and Audit Committee (Advisory) held at Council Chamber, Town Hall, Upper Street, N1 2UD on 23 May 2023 at 7.00 pm.

Present: Councillors: Councillor Nick Wayne (Chair), Councillor Flora Williamson (Vice-Chair), Councillor Janet Burgess MBE and Councillor Sara Hyde.

Also Present: Independent member: Alan Begg (Co-Optee) and Alan Finch (Co-Optee)

Councillor Nick Wayne in the Chair

56 **APOLOGIES FOR ABSENCE (Item A1)**

Apologies received from Councillor Ward

57 **DECLARATION OF SUBSTITUTE MEMBERS (Item A2)**

None.

58 **DECLARATIONS OF INTEREST (Item A3)**

Alan Finch, an independent member on this committee has declared interest for item B1 as part of Alan's work with the LGA he is the LGA's main liaison with PSAA which is the company responsible for monitoring the performance of external audit firms.

59 **MINUTES OF PREVIOUS MEETING (Item A4)**

Agreed.

60 **ARRANGEMENTS FOR AUDIT COMMITTEE 2023/24 AND APPOINTMENTS TO PENSIONS SUB-COMMITTEE, BOARD AND PERSONNEL SUB-COMMITTEE (Item C1)**

RESOLVED:

(a) That the membership appointed by Council on 11 May 2023, terms of reference and dates of meetings of the Audit and Audit (Advisory) Committee for the municipal year 2023/24, as set out at Appendix A to the report, be noted.

Pensions Sub-Committee

(b) That the size of the Pensions Sub-Committee and its Terms of Reference, as detailed in Appendix A of the report, be confirmed.

(c) That the following members be appointed to the Pensions Sub-Committee for the municipal year 2023/2024, or until successors are appointed:

<i>Councillors</i>	<i>Substitute Members</i>
Paul Convery (Chair)	Dave Poyser
Diarmaid Ward (Vice-Chair)	Jenny Kay
Satnam Gill OBE	
Michael O'Sullivan	

(d) That Councillor Paul Convery be appointed as Chair and Councillor Diarmaid Ward be appointed as Vice-Chair of the Pensions Sub-Committee for the municipal year 2023/2024, or until successors are appointed.

Personnel Sub-Committee

(e) That the size of the Personnel Sub-Committee and its Terms of Reference, as detailed in Appendix A of the report, be confirmed.

(f) That the following members be appointed to the Personnel Sub-Committee for the municipal year 2023/2024, or until successors are appointed:

<i>Councillors</i>	<i>Substitute Members</i>
Anjna Khurana (Chair)	All other Executive members
Kaya Comer-Schwartz	Dave Poyser
Diarmaid Ward	Jason Jackson
Satnam Gill OBE	Jenny Kay
Janet Burgess	Jilani Chowdhury
Diarmaid Ward	

(g) That Councillor Anjna Khurana be appointed Chair of the Personnel Sub-Committee for the municipal year 2023/24, or until a successor is appointed.

Pensions Board

(h) That the membership and terms of reference of the Pensions Board be noted, as set out in Appendix A of the report.

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REVIEW OF COUNCIL CONSTITUTION (Item C2)

The Interim Director of Law & Governance and Monitoring Officer updated the committee on the progress of the constitution review. This matter was previously considered at the 13th March 2023 meeting, at that time the Audit Committee approved the Terms of Reference (TOR) for a review of the constitution to ensure it is fit for purpose.

An additional document was tabled, including proposed revisions to the Officer Employment Procedure Rules.

The following points were noted in the discussion:

- The Committee considered the proposed amendments to the Audit Committee terms of reference, in particular the responsibilities for byelaws, polling districts and the calculation of council tax base. It was queried if it would be appropriate for these functions to be allocated to other committees or decision-making bodies. In response, officers advised that these were non-executive functions and could not be considered by the Executive.
- The report suggested disbanding the Pensions Sub-Committee and establishing a Pensions Fund Committee. The Chair suggested changing the name of the Pension Fund Committee to the Pensions Committee. It was noted that a new TOR would be needed for the Committee.
- The report suggested that the Personnel Sub-Committee becomes a new Employment and Appointments committee.
- Part of the remit of the Personnel Sub-Committee has been to approve special severance payments for departing officers over £100,000. However, new statutory guidance sets out that this should now be approved by a vote of Full Council, with special severance payments between £20,000 and £100,000 approved by the Chief Executive and the Leader of the Council. Members felt that there should remain member oversight of these special severance payments. The Committee emphasised the need for transparency, public accountability and democratic oversight. The Committee considered it was important to scrutinise these decisions – either in Audit Committee or in the Personnel Sub-Committee.
- The Director of Human Resources noted that the details of special severance payments were confidential and could not be considered in the public domain. As these decisions often had to be made at pace, there would be practical issues to overcome in introducing advance member oversight arrangements, such as the number of members quorate for these short notice meetings. Audit Committee already had a role in relation to scrutinising these payments which are included in the annual accounts. It was agreed to consider how best to strengthen this oversight further outside of the meeting.
- It was suggested that Phase 2 of the constitution review should have a focus on format and style and address accountability of decision makers mainly around officer delegations as well as other sections which will need a steer from members. Some of the work in phase 2 has started, such as looking at financial regulations and procurement rules.
- The Committee requested the Employment and Appointments Committee produce an annual or bi-annual report on their activity.

RESOLVED:

- That the work of the Constitution Review Working Group in reviewing the constitution and proposing revisions to ensure legal compliance be noted.
- That the tabled amendments to the Officer Employment Procedure Rules be endorsed;

- That the Interim Director of Law and Governance be authorised to make any subsequent necessary changes to the report, prior to submission to Council in July, following consultation with members of the Audit Committee;
- That the following recommendations be made to Full Council:
 - Agree the proposed revisions to Part 1 of the Constitution as detailed in Appendix 1;
 - Agree the proposed revisions to the Articles of the Constitution as detailed in Appendix 2 and adding the Employee Code of Conduct as detailed in Appendix 5;
 - Adopt the revised Officer Employment Procedure Rules, which now incorporate the previously separate protocol document, in Appendix 4;
 - Adopt revised Terms of Reference for the Audit Committee to establish it as the Audit and Risk Committee including authority to revise and keep up to date the Council's Financial Regulations and Procurement Rules as detailed in Appendix 5;
 - Adopt revised Terms of Reference for the Standards Committee as detailed in Appendix 5;
 - Adopt new Terms of Reference for the Pension Sub-Committee to establish it as a Pension Fund Committee appointed by the Council as detailed in Appendix 5;
 - Adopt new Terms of Reference for the Pension Board as detailed in Appendix 5;
 - Adopt new Terms of Reference for the Personnel Sub-Committee to establish it as an Employment and Appointments Committee appointed by the Council as detailed in Appendix 5.
 - Adopt revised Terms of Reference for the Statutory Officer Grievance Committee and Appeals Committee so that it only applies to the Chief Executive as detailed in Appendix 5;
 - Agree a Review of the Overview and Scrutiny function to include revised Terms of Reference for the Scrutiny Committees and Scrutiny Procedure Rules.

62 **EXTERNAL AUDIT REPORT (Item C3)**

The Corporate Director of Resources detailed the progress on the 21/22 audit process along with colleagues from Grant Thornton, the Council's external auditor. It was noted that there had been good progress since the previous Audit Committee meeting on the 13th March 2023. The final accounts are now expected to be with the Audit Committee on the 10th of July meeting.

The following points were noted during the discussion:

Audit Committee and Audit Committee (Advisory) - 23 May 2023

- It was explained to the committee that the delays in completing the final accounts report so far have been mostly related to pensions matters. It was explained that this was a wider issue across the sector.
- It was noted that this was the final year with external auditors Grant Thornton and officers will start to prepare for the work with KPMG the new external audit partners.
- The Chair thanked colleagues working on the external audit report both within the council and Grant Thornton for all their hard work.
- The Director of Finance set out the interim report and stated that there were no significant recommendations however there are several improvement recommendations. Overall the audit report has been a positive report for the Council, and there is recognition around the good financial management of the council within the report.
- It was explained to the committee that the Pension Fund net liability in layman's terms was the activity of triennial evaluation for the pension fund which would inform the council what contributions needed to be made. The triennial evaluation had caused delays in audits across the sector. The Department for Levelling Up, Housing and Communities (DLUHC) are currently working with others to find solutions to these types of issues. It was noted that there is no financial impact of this.
- It was explained financial data was on the whole accurately recorded however generally in local government there are concerns on the variability of non-financial data. One recommendation on how the council could do things differently is to implement a data quality policy which would address how the systems are reviewed and what type of data is accepted.
- The Committee noted the financial risks across the local government sector and that some local authorities had been subject to government intervention and special measures. The Committee was informed that, due to the council's robust financial management, Islington was unlikely to face such interventions. The external auditors also noted that the council's arrangements with children with special educational needs is a real strength in comparison with other councils, and can be seen as a good indicator of good financial management and wider rigour in the process.
- It was agreed that further review of the pension fund was not necessary to be presented at the Audit Committee and could be better suited to the Pension Board.
- Members discussed relaying the positive feedback from the External Auditors to all members, highlighting the work of the Finance Team in contributing to sound financial management.

RESOLVED:

- That the contents of the report be noted.

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CYBER DEFENCE ANNUAL REPORT (Item C4)

The Director of Digital Services introduced the report. The following main points were noted in the discussion:

- A new chief officer to manage cyber security threats had been successfully recruited.
- The Director of Digital Services assured the committee that there were currently no active cyber security incidents and summarised the protections the council had in place.
- A member asked what procedures there are in place to protect the public's data when we procure services from organisations. The Data Protection Act and GDPR legislation provides a framework for protecting data when we enter into contracts, and it also puts an obligation on the company to inform the council of any data breaches. Officers also explained how the council assesses the security of third party systems.
- A business continuity exercise was carried out recently, focusing around a cyber event and showed all possible eventualities. There were a number of lessons learned from this exercise, although most were fairly straightforward, for example, when to use paper based records, keeping up to date contact sheets, and the importance of clear communication.
- The overarching council risk report in relation to cyber risk shows that the external risk continues to increase, however there are measures in place to protect against this.
- The Audit Committee requested that future reports include further description of cyber security activity and the intended outcome. It was also suggested that future reports could highlight any significant risks (both hardware and software) that should be escalated to the Audit Committee.

RESOLVED:

That the report and exempt appendix be noted as a statement of the current position for the council's cybersecurity assurance programme and the ongoing audits and activity.

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CYBER DEFENCE ANNUAL REPORT - EXEMPT APPENDIX (Item F1)

Noted.

CHAIR

Finance
7 Newington Barrow Way
London N7 7EP

Report of: Corporate Director of Children's Services

Meeting of: Audit Committee

Date: 11th July 2023

Ward(s): All

Subject: Risk Deep-Dive: Safeguarding Children

1 Synopsis

In accordance with its Terms of Reference, the Audit Committee (the Committee) is required to consider the Council's arrangements for corporate governance and risk management.

The Committee agreed at its meeting in June 2022 to conduct regular deep-dives on individual Principal Risks. The purpose of the deep-dive is for the Committee to obtain a deeper understanding of the chosen risk area, develop insight into risk controls and the action plan, and to get the opportunity to discuss the risk directly with the risk lead.

1. Recommendations

- 1.1. The Committee is asked to note the risk management strategy for this Principal Risk.

2. Background

2.1 Risk Context

- 2.2 All Local Authorities in conjunction with its partners have a duty to safeguarding children as set out in legislation and guidance. The system including children, families, communities, professionals, agencies involved in safeguarding children is complex and multi-faceted and co-ordination, assurance, review is always needed across the partnership.

2.3 Children's Social Care and Early Help Vision

Children and young people are safe, can overcome difficulties and can form secure relationships through their childhood and into their adulthood.

To achieve our vision, we

- support and work in partnership with parents and carers to help develop and build on safe, strong and lasting relationships with the children they care for.
- build a strong stable workforce of resilient practitioners who can make empathic, purposeful relationships with children, their families and carers that make a difference to children's lives. They will be able to learn from and adapt to evidence about what works best for children at risk, in need, or Looked After.
- have high aspirations for all the children we work with and support them to be the 'best they can be'.
- work with partner agencies to develop a common ethos and approach to our work and to minimise the number of professionals that children and families work with.
- ensure that our relationship-based approach is reflected at all levels of the service, from senior managers to family practitioners and support staff.

2.4 Characteristics of children supported

In 2022/23 we supported 2,203 children through early help. Our rates for Children in Need (CIN) and Child Protection (CP) Plans are relatively high compared with statistical neighbours, reflecting the high level of need in Islington. The CIN rate at 483 is second highest across our statistical neighbours. The CP rate of 37 at the end of March 2022 was the fourth highest among our statistical neighbours. We had 326 Children Looked After (CLA) including 35 unaccompanied asylum seekers and 624 care experienced young people as at March 2023.

There are more boys (54%) than girls (44%) supported; and the age profile varies across the status of children, with more adolescents looked after than younger age groups. Some global majority groups are over-represented in comparison to the Islington child population, while others are under-represented. Children of Black Caribbean and Mixed backgrounds are over-represented across all CIN, CP and CLA groups, Black Caribbean and Black African young people are over-represented in the care-leaver cohort. Work has been focused on reducing the disparity across the Safeguarding services with the Islington Safeguarding Children Partnership having addressing disproportionality as one of the priorities.

Based on the 2021 Census, there were 5,430 children and young people aged 0-24 who were disabled living in Islington, which equates to 9.0% of the resident population. This was above the national average of 8.5%. In January 2023, Islington was responsible for 1,780 Education, Health and Care Plans, an 18% increase from 2021.

The complexity of need has increased overall, and the service has also seen an increase in demand in some areas. A particular challenge since end of 2021 has been the increasing needs of unaccompanied asylum seeking children.

Pressures due to Covid-19 impact, Brexit and cost of living crisis is creating national difficulties in the recruitment market for social workers and staff in residential care settings. The Council continues to work with stakeholders to address recruitment challenges. Despite these challenges, the Council has consistently maintained staffing

levels where we are able to respond to safeguarding concerns and comply with procedures.

The cost-of-living crisis is causing increased pressures on families which is manifesting in increasing cases of domestic violence, mental health and contextual safeguarding risks.

New legislation on unregulated accommodation for children in care is coming into force in September 2023 and is likely to further heighten the lack of suitable placements for 16–17-year-olds.

National reforms or changes in legislation and requirements, high profile child deaths can increase risks as demand for services increases.

If safeguarding practice and provision for children and young people are ineffective in relation to familial and extra familial risks the consequences are serious including fatality or significant harm to children

3. Mitigation

- 3.1 The service is currently judged by Ofsted to be Outstanding (March 2020) [50150002 \(ofsted.gov.uk\)](https://www.ofsted.gov.uk/inspections/50150002). A shorter inspection was carried out into children looked after and care leavers in October 2022 and whilst this is not a graded inspection findings were extremely positive [50199743 \(ofsted.gov.uk\)](https://www.ofsted.gov.uk/inspections/50199743). The Special Educational Needs and Disability (SEND) Inspection took place in November 2021 [50199743 \(ofsted.gov.uk\)](https://www.ofsted.gov.uk/inspections/50199743) and we are only one of a handful of Local Authorities not to receive a Written Statement of Action due to the positive findings regarding the provision of services for children with SEND.
- 3.2 The current risks are being managed by a number of mitigations in place. These include:
1. Robust Quality Assurance and monitoring processes in place.
There is a comprehensive and robust quality assurance framework in place which ensures feedback from children, families, staff, partners, complaints, compliments, audits and observations of practice are acted upon and feedback into the system to drive forward improvements in service delivery.
 2. Training and development processes in place which give ongoing assurance regarding quality of work and adherence to legal framework
All staff are trained in an evidenced based practice model “Motivation Practice” which ensures consistency and quality of intervention to children and families. This is alongside specific training on different areas of abuse and neglect both within the family and outside of the family (contextual safeguarding or extra familial harm). The staff also have access to all the training run for all agencies who work with children and families from the Islington Safeguarding Children’s Partnership.

3. Workforce strategy in place.
The service has a comprehensive training and development strategy and plan for all staff. This is regularly reviewed by the Senior Leadership team 6 weekly.
4. Close liaison with family courts to ensure cases which can be heard progress to final hearing, so children are afforded permanency. Covid 19 caused a backlog in all courts and the Family Court, where Judges make decisions about the future care of children whether that be at home, with family members or in care, was no different. For children this has meant waiting for a decision about where they will be cared for the duration of their childhood. There were 56 such delayed cases running over 40 weeks (as opposed to the aim of permanency decisions to be made in court in 26 weeks), this currently stands at 26 cases and is reducing month on month.
5. Placements sufficiency strategy (additional resources in our placement team and working regionally to devise solutions).
The national placement sufficiency crisis (having enough foster carers, residential children's homes or supported accommodation providers) continues to effect Islington children who are in care. The issue is being able to locate a suitable placement to protect, support, love and care for our children for the duration of their childhood. We have:
 - a) Increased the number of staff available to source such placement
 - b) Created innovative projects to secure more local foster carers and improved our recruitment drive
 - c) Worked regionally and nationally to alleviate the lack of care placements
 - d) Developed intensive wrap around intervention for adolescents to enable them to live within Islington and with their families free from contextual harm.
6. Increased mental health and clinical support in care leaving service for UASC children (unaccompanied). Specialist UASC project officer. We have increased the availability of clinicians and UASC experts within the service who can directly see UASC children and young people, skill up the workforce and strategically work with other agencies to improve the lives of UASC. We have also met with the Home Office regarding the high numbers of UASC in care and the need to share the delivery of services with all Local Authorities.

3.3 Trend in the next 12 months

We are expecting that the complexity of issues for children and families to be sustained given the impact of Covid 19 and the cost of living crisis. Whilst poverty isn't an indication in itself of abuse and neglect, living in poverty is more likely to be associated with parental mental health, parental substance misuse and domestic violence all which in turn mean that children are likely to suffer harm. Our service over the last year has been successful in reducing the numbers of children looked after from 401 (at a peak in August 2022) to 329 (March 2023). The trend is expected to continue with the average number of children needing to come into care per month reducing.

The mitigations in place continue to reduce some of the risks however the national placement sufficiency crisis is expected to be present in our society for the foreseeable future and National Reforms have not had the expected impact.

4 Implications

4.1 Financial Implications

- 4.2 There are no financial implications arising from this report. However, it's important to bring to the Committee's attention that the Children's Social Care placements budget was £19.2m in 2022/23 and overspent by £1.053m due to elevated level of demand for provision. The main drivers of the cost pressures are delays to care proceedings and a shortage of permanent accommodation for care leavers. The budgets for fostering and supported accommodation in particular are under significant pressure. While delays to care proceedings are reducing, demand pressures are expected to remain into the future. The unit costs of meeting provision are also increasing due to inflationary pressures in the current fiscal environment.
- 4.3 There was also a £0.587 overspend in 2022/23 due to the cost of packages that support children at home to avoid them coming into care or whilst we wait for a placement to materialise. Approximately 70% of this pressure is driven by court ordered taxi transport to schools.

5 Legal Implications

- 5.1 There are no legal implications arising from this report. Legal advice and support will be provided, where necessary, in relation to individual risks as risks are identified.

5.2 Environmental implications and contribution to achieving a net zero carbon Islington by 2030

- 5.3 There are no environmental implicating arising from the recommendations in this report.

6.0 Equalities Impact Assessment

- 6.1 The Council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in

public life. The Council must have due regard to the need to tackle prejudice and promote understanding.

- 6.2 An Equalities Impact Assessment is not required in relation to this report, because the recommendation being sought does not have direct impacts on residents.

7 Conclusion and reasons for recommendations

- 7.1 The Committee is asked to note the risk management strategy for this Principal Risk.

Appendices:

- Appendix 1 – Risk on a Page: Safeguarding Children

Final report clearance:

Signed by:

Corporate Director of Children's Services

Date: 7th June 2023

Report Author: Laura Eden
Email: Laura.eden@islington.gov.uk

Financial Implications Author: Paul Clarke
Email: Paul.Clarke@islington.gov.uk

Legal Implications Author: Marie Rosenthal
Email: Marie.Rosenthal@islington.gov.uk

Appendix 1: Risk on a page – Safeguarding Children (Extract from Principal Report)

Risk Information Risk Title – 17. Safeguarding Children	Risk Scores	Existing Controls
<p>Risk</p> <p>Safeguarding practice and provision for children and young people are ineffective to current and new familial and extra familial risks</p> <p>Cause</p> <p>Non-compliance with procedures, safeguarding practice and provision for children and young people are ineffective to current and new risks, lack of suitable trained and recruited staff, increase in demand</p> <p>Consequence</p> <p>Significant harm to a child(ren), death of a child</p> <p>Risk Update:</p> <p>The complexity of need has increased overall, and the service has also seen an increase in demand in some areas. A particular challenge since end of 2021 has been the increasing needs of unaccompanied children.</p> <p>Pressures due to Covid-19 impact on health staff, Brexit and cost of living crisis is creating difficulties in the recruitment market for social workers and staff in residential care settings. The Council continues to work with stakeholders to address recruitment challenges. Despite these challenges, the Council has consistently maintained staffing levels where we are able to respond to safeguarding concerns and comply with procedures.</p>	<p>Current Score:</p> <p>L:2</p> <p>I:5</p> <p>Target Score:</p> <p>L:2</p> <p>I:5</p> <p>Gap to target:</p> <p>L:0</p> <p>I:0</p>	<ol style="list-style-type: none"> 1. Robust Quality Assurance and monitoring processes in place. 2. Training and development processes in place which give ongoing assurance regarding quality of work and adherence to legal framework 3. Workforce strategy in place. 4. Close liaison with family courts to ensure cases which can be heard progress to final hearing, so children are afforded permanency. 5. Placements sufficiency strategy (additional resources in our placement team and working regionally to devise solutions). 6. Increased mental health and clinical support in care leaving service for UASC children (unaccompanied). Specialist UASC project officer.

The cost-of-living crisis is causing increased pressures on families which is manifesting in increasing cases of domestic violence, mental health and contextual safeguarding risks.

New legislation on unregulated accommodation for children in care is coming into force in August and is likely to further heighten the lack of suitable placements for 16–17-year-olds.

Action	Expected impact	Resources required	Owner	Due Date	Status
Working locally, regionally and nationally to address the challenges in social care staff recruitment.	Reduce likelihood and impact	Staff/Finance	J. Abbey	Ongoing	In Progress
Working locally, regionally and nationally to alleviate the lack of care placements.	Reduce Likelihood	Staff	J. Abbey	Ongoing	In Progress

Report of: **Corporate Director - Resources**

Meeting of: **Audit Committee**

Date: **11 July 2023**

Ward(s): **All**

Subject: Principal Risk Report 2023

1. Synopsis

- 1.1. The articulation and mitigation of risks at Islington Council is a dynamic process, with risk management embedded in decision-making. This report presents the current principal risks facing Islington. The report represents the Council's position as at May 2023.
- 1.2. The Principal Risk Report (PRR) is an annual report written in consultation with risk leads, Directorate Management Teams (DMTs) and the Corporate Management Board (CMB). The previous PRR was presented to the Audit Committee in June 2022.
- 1.3. Overall the report details:
 - **Appendix 1: Principal Risk Map** – the heatmap diagram indicates the positioning of Principal Risks, detailing the likelihood and impact scores for each risk. The impact matrix details the risk scoring mechanism.
 - **Appendix 2: Risk Universe** – presents an overview of the risks by category, demonstrating our balance of risk;
 - **Appendix 3: How areas of risk link to our objectives** – maps the links between Principal Risks and the Council's strategic objectives.
 - **Appendix 4: Executive Summary of the Principal Risks** – details the current and target risk score for each risk, the CMB risk lead, and forward trend;
 - **Appendix 5: Principal Risk detailed information and action plans (risk on a page)** details the risk information and update alongside the action plan

for each risk to achieve the target risk score. The target risk score is an expression of our risk appetite setting out the risk score we are working towards in the next 12 months.

2. Recommendations

- 2.1. The Committee is asked to note the report.

3. Background

- 3.1. The Council's Risk Manager met with circa 30 risk leads across the Council over March and April 2023, to review principal risks. These discussions covered the achievement of previously set objectives, assessed the current risk profile, identified any new risks and mitigating actions, and current and target risk scores were revisited. During May 2023, Directorate Management Teams reviewed and agreed the risks within their remit. The report was discussed and agreed by the Corporate Management Board in May 2023.

Key risk themes

- 3.2. Key risk themes are currently presenting as follows:
 - Inflation and cost of living crisis – continued economic pressure due to inflation is a factor for many Principal Risks, most notably Financial Resilience of Residents and the New Build Programme with construction costs at a 40-year high. Social inequalities are likely to increase due to the cost-of-living crisis and put more families under financial pressure.
 - Financial Resilience of the Council – While significant uncertainty remains around local authority funding from 2025/26, there has been some improvements in forecasts and more resilience built into the Council's budget to address ongoing uncertainty. There continue to be a need for significant savings over the medium term and this is reflected in the Medium-Term Financial Strategy.

Summary of the Council's overall risk position

- 3.3. The Council has articulated 28 principal risks as at May 2023. Seven principal risks have reduced in overall risk score since the last report, and five have increased in risk score. Two principal risks have moved within target score since the last report (Non-Recent Child Abuse, Serious Information Breach). The Council continues to operate in a heightened risk environment, with 25 risks scored above the agreed target. Target risk scores outlined at Appendix 4 reflect our ability to mitigate risks.

- 3.4. One principal risk has been closed (Covid-19 Outbreak Control) and one new principal risk has been added (Increasing Homelessness Pressures). Further commentary is included below.
- 3.5. A report from External Audit included an observation of the high number of principal risks and a recommendation to rationalise the total number of risks in the Principal Risk Report. It is management's view that the number of risks is reasonable given the breadth of Council responsibilities, the challenging external environment in which it operates, and the ambitious missions in the strategic plan. The Council's risk management framework includes a risk appetite statement and outlines the basis for determining if a risk meets the criteria for principal risk classification.
- 3.6. External Audit also made a recommendation on developing risk management training for all staff. Management will consider how to best to develop and deploy risk management training.

New principal risk

- 3.7. One new principal risk has been added as described below.
- 3.8. **Risk title:** Increasing Homelessness Pressures
Risk Description: Increasing numbers of people applying as homeless lead to the increased use of expensive and inappropriate use of temporary accommodation which will place a financial burden on the Council's General Fund budgets.
Cause: Increasing numbers of people applying as homeless due to the cost-of-living crisis, the war in Ukraine and the sale of private rented properties due to the wider global economic environment
Consequence: Considerable financial pressure on the council's General Fund budget, hardship for Islington residents facing homelessness
Rationale for adding: Nationally, there has been an increasing trend in the number presenting as homeless or at threat of homelessness. Islington is seeing the same trend with 1,029 homeless households living in temporary accommodation as of 31st March 2023, compared to 848 homeless households the previous year. Numbers are expected to increase over the short term due to cost of living pressures and a shortage of available social housing options and could have a significant impact on the Council's General Fund's budget.

Closed principal risk

3.9. One principal risk has been removed from the principal risk report and will be managed at Directorate level. The rationale for the change in status is provided below.

3.10. **Risk title:** Covid-19 Outbreak Control

Risk description: Significant future wave/s of Covid-19 cause harm to local communities.

Rationale for closing: Following the roll-out of the Covid-19 vaccination programme, the risk from any further waves has significantly reduced. The national strategy for Covid-19 management changed in 2022 and there is no longer a national structure in place for population testing. The Public Health team continues to monitor Covid trends, including any new variants that may emerge. The team continue to work with NHS and voluntary sector partners to promote take-up of vaccination for eligible groups and managing Covid-19 in vulnerable settings.

Key amendments to risk articulation

3.11. The articulation of principal risks is continuously reviewed to ensure they accurately describe the current risk context. In this update, two principal risks have been amended as described below.

3.12. **Risk Title:** Cost of Energy (Previously Volatility in Energy Markets)

Risk description: Sustained high and increasing energy costs, and longer-term volatility of energy markets, cause budget pressures for the Council, Schools and residents on the Council's communal heating systems and Bunhill heat network

Cause: Sustained high prices in the global energy market, performance of public buying organisation (LASER), services do not adapt budgets and activities to meet pressure in energy expenditure.

Consequence: Significant overspend on Council budget, key projects and programmes scaled down, paused or cancelled, savings targets not met.

Risk sponsor: Corporate Director for Environment and Climate Change

Rationale for change: The risk has been amended to reflect that volatility has stabilised in the short term and the main risk exposure is around sustained high energy costs and its impact.

3.13. **Risk Title:** Climate Change Resilience (Previously Delivering Net Zero Carbon)

Risk description: The Council and the borough does not achieve the necessary climate mitigation and adaptation measures in response to the climate emergency.

According to climate risk modelling by Mayor of London and Bloomberg, Islington is amongst six boroughs at particularly high risk from the effects of climate change.

Cause: Lack of climate adaptation and mitigation measures implemented within the Council's Net Zero Carbon strategy. Resource and/or funding constraints (access to external funding) to deliver the Net Zero Carbon Strategy; Lack of supportive national policy and funding for decarbonisation; Lack of influence over key stakeholders (local/national)

Consequence: Flood risks to communities, businesses and infrastructure; risks to health, well-being and productivity from higher temperatures and poor air quality; risks of water deficits in public water supply, and for energy generation and industry, with impacts on freshwater ecology; disadvantaged communities will be disproportionately affected by climate change impacts; reputational impact of failing to meet net zero carbon target.

Risk sponsor: Corporate Director for Environment and Climate Change

Rationale for change: The risk has been amended to reflect the increasing focus on climate change adaptation and resilience alongside delivering on the zero carbon commitments.

4. Implications

4.1. Financial Implications

4.1.1. The programme of work has been met from within the existing risk management budget. The financial implications of individual principal risks are met by local budgets.

4.2. Legal Implications

4.2.1. There are no legal implications arising from this report. Legal advice and support will be provided, where necessary, in relation to individual risks.

4.3. Environmental Implications and contribution to achieving a net zero carbon Islington by 2030

4.3.1. The significant increase in energy costs for the Council means there is less budget available for non-statutory areas of work, which includes decarbonisation works. However, it has also focussed minds on the drive to reduce energy consumption, which is delivering carbon savings.

4.3.2. The report recommends agreeing the action plans in the risk register, some of which have environmental implications, including:

- Accelerate installation of smart meters in Council buildings – will enable better controls on energy use and could lead to reductions in emissions
- Corporate Energy Savings Programme activities – also expected to lead to a reduction in emissions

- Completion of the decommissioning of Newington Barrow Way datacentre and the removal of all non-site-specific IT from 222 Upper Street data centre – implications include reduction in energy consumption on-site (although could be increases elsewhere) plus generation of IT waste that needs to be disposed of correctly
- Deliver London wide work-plans in our role as lead authority for Renewable Power on the London Councils climate change programme – could result in the Council joining a power purchase agreement for renewable energy, reducing our carbon emissions
- Project to roll out inter-linked alarms in street properties – materials use

4.4. Equalities Impact Assessment

- 4.4.1. The Council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.
- 4.4.2. An Equalities Impact Assessment is not required in relation to this report because the recommendation being sought does not have direct impacts on residents.

Appendices:

- **Appendix 1: Principal Risk Map** – the heatmap diagram sets out positioning of risks, detailing the likelihood and impact scores. The impact matrix details the risk scoring mechanism.
- **Appendix 2: Risk Universe** – presents an overview of the risks by category, demonstrating our balance of risk;
- **Appendix 3: How areas of risk link to our objectives** – maps the links between Principal Risks and the Council's strategic objectives.
- **Appendix 4: Executive Summary of the Principal Risks** – details the current and target risk score for each risk, the CMB risk lead, and forward trend;
- **Appendix 5: Principal Risk detailed information and action plans (risk on a page)** details the risk information and update alongside the action plan for each risk to achieve the target risk score. The target risk score is an expression of our risk appetite setting out the risk score we are working towards in the next 12 months.

Final report clearance:

Agreed by:

Corporate Director of Resources

Date: 20.07.2023

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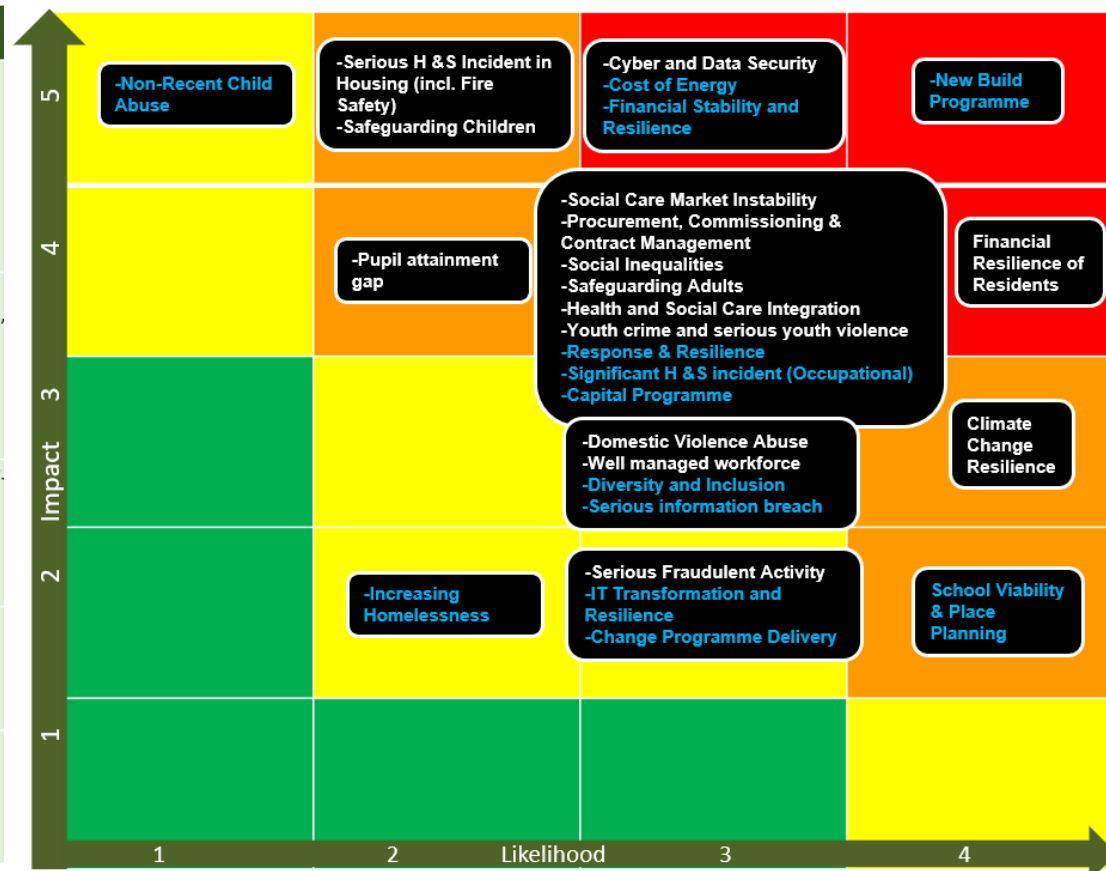
Tel: 020 7527 2347

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Appendix 1 - Principal Risk Map and Impact Scoring Matrix (Note: Risk titles in blue indicate a change in score from the 2022 report)

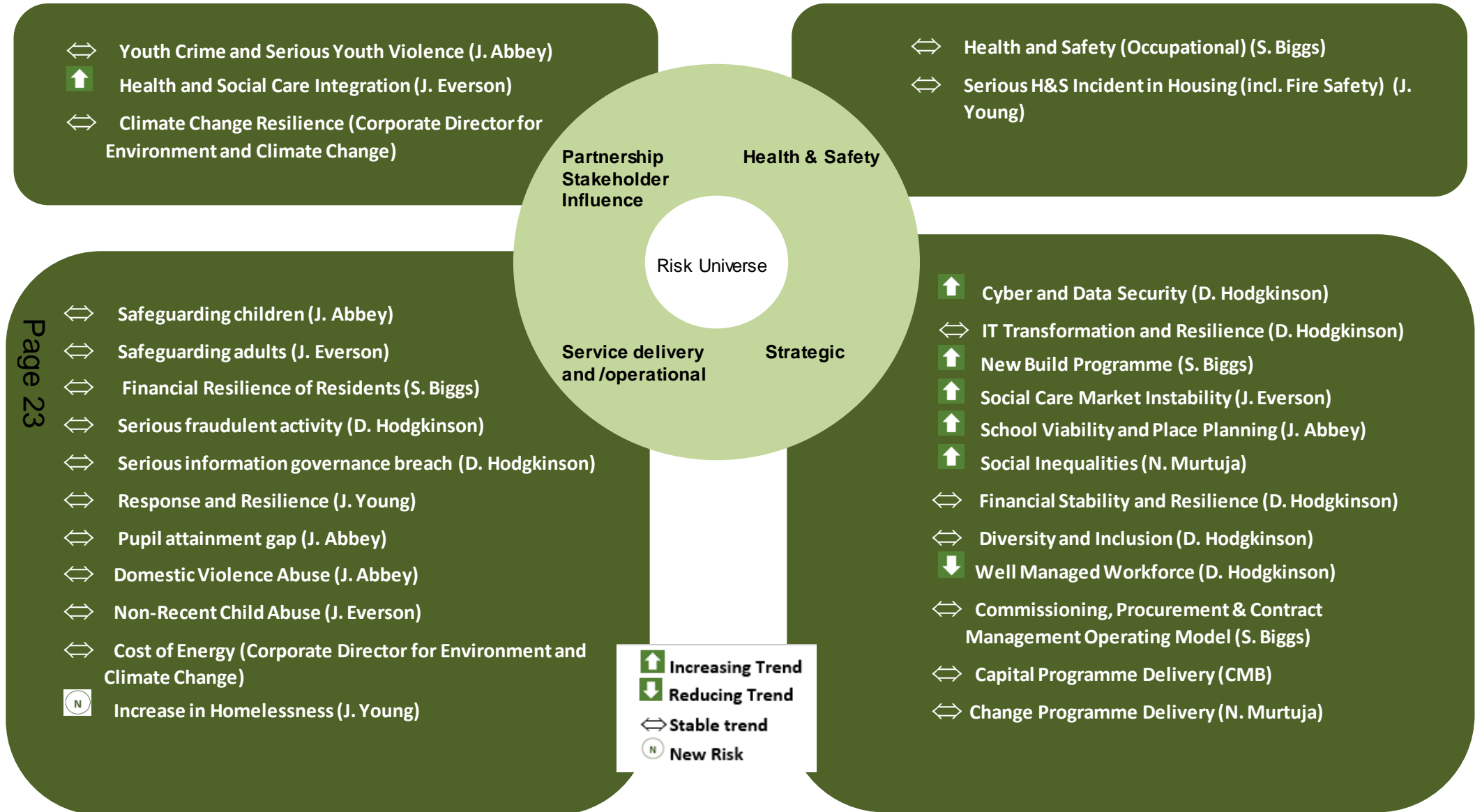
Impact Ratings	Financial	Service Delivery	Health and Wellbeing	Reputation
5	Financial loss above £10m.	Major disruption to a number of critical services.	Multiple deaths or serious/life-changing non-recoverable injury(s)/extreme safeguarding alerts likely.	Long term damage – e.g. Adverse national or local publicity, highly damaging severe loss of public confidence. Widespread and high level of criticism. Impacts on staffing and recruitment.
4	Financial loss above £8m.	Major disruption of a critical service.	Multiple casualties with recoverable injuries. Major safeguarding concerns potentially affecting multiple people. Evidence of known sustained neglect or abuse without intervention.	Medium to long term damage – e.g. Adverse local, regional or national publicity, major loss of confidence, a matter that is frequently referenced in relation to the council.
3	Financial loss above £6m.	Major disruption of an important service. Moderate disruption of a critical service.	Noticeable safeguarding risks – evidence of known neglect or abuse without intervention.	Medium term damage – e.g. Adverse publicity, local, regional and national coverage, with significant follow-up stories
2	Financial loss above £4m.	Moderate disruption of an important service.	Single casualties with recoverable injuries. Noticeable safeguarding risks – evidence of neglect.	Short term damage – e.g. Adverse publicity, national follow-up stories on the same issue.
1	Financial loss above £1m.	Brief disruption of an important service. Repeated disruption of a core service.	Medical treatment required, semi-permanent harm, up to 1 year. Safeguarding concerns of neglect.	Short term damage – e.g. Adverse publicity, regional follow-up stories on the same issue.

Likelihood Score	1 - Rare	2 – Unlikely	3 – Possible	4 – Likely
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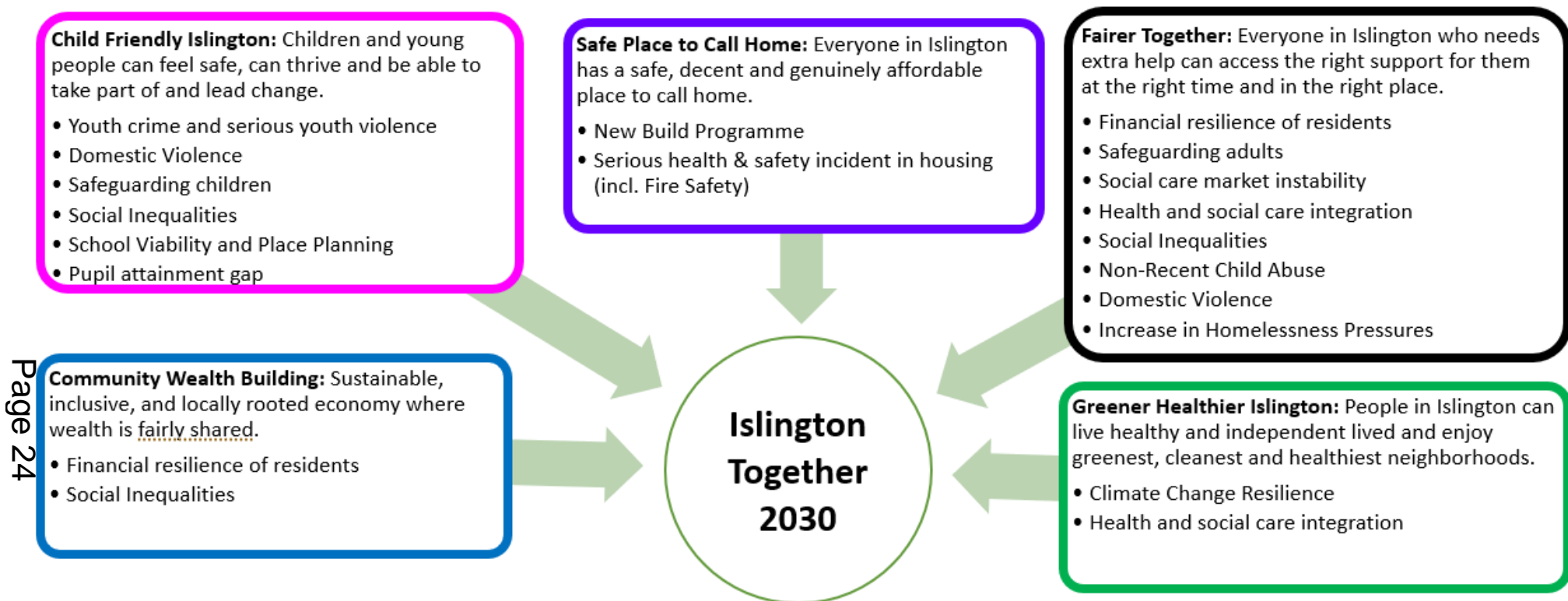


Note: risks have been scored considering the above criteria in view of the current controls in place. The criteria (Financial, Service Delivery, Health and Wellbeing or Reputation) considered most appropriate to each risk has been chosen. Risks in the same black box share the same scoring, the order they appear in the box is not indicative of severity.

Appendix 2 - Risk Universe (Including risk forward trend)



Appendix 3: How areas of risk link to our strategic objectives



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Continue to be a well-run Council and making a difference despite reduced resources

Service Delivery	Financial Stability	People	Data, Governance and Technology
<ul style="list-style-type: none"> • Response and Resilience • Serious Health and Safety Incident (Occupational) • Commissioning, Procurement & Contract Management Operating Model • Change Programme Delivery 	<ul style="list-style-type: none"> • Financial Stability and Resilience • Capital Programme Delivery • Cost of Energy 	<ul style="list-style-type: none"> • Diversity and Inclusion • Well-managed Workforce 	<ul style="list-style-type: none"> • Serious Fraudulent Activity • Information Governance • Cyber and Data Security • IT Transformation and Resilience

Appendix 4 - Executive summary of principal risks (Details for each risk are included in Appendix 5)

Current risk score in brackets indicate change from last Principal Risk Report (+ - 0).

Current risk score (and change since the last report)	Current Score Likelihood x Impact	Target Score	Risk	CMB Risk Sponsor	Forward trend May 2022	Forward trend May 2023	Comment on risk trend
20 (+8)	L:4 I:5 Score 20	L:3 I:5 Score 15	1. New Build Programme delivery - Affordability challenges slow progress in delivering new council homes	S. Biggs	↔	↑	The external economic environment, with high inflation and interest rate rises, has led to a significant increase to the cost of building new homes and increased risk of contractor withdrawal/failure. This risk is therefore assessed as increased and presenting with an increased forward trend.
16 (0)	L:4 I:4 Score 16	L:3 I:3 Score 9	2. Financial Resilience of Residents – Failing to appropriately support residents	S. Biggs	↑	↔	The Council is delivering a broad programme of interventions to support residents with the cost-of-living crisis. The cost-of-living issues experienced by residents are expected to continue through 2023/24. The Council has completed significant work to mitigate the worst impacts for our low-income households, flattening the curve for those impacted and stabilising the forward outlook for the next 12 months.
15 (-5)	L:3 I:5 Score 15	L:3 I:4 Score 12	3. Cost of Energy	Corporate Director for Environment and Climate Change	↑	↔	The risk profile has slightly improved as volatility in the energy markets has reduced in recent months. There remains a high level of uncertainty of energy costs beyond 2024/25 but the risk presents with a stable trend for the next 12 months.

Current risk score (and change since the last report)	Current Score Likelihood x Impact	Target Score	Risk	CMB Risk Sponsor	Forward trend May 2022	Forward trend May 2023	Comment on risk trend
15 (-5)	L:3 I:5 Score 15	L2 I:2 Score 4	4. Financial Stability and Resilience	D. Hodgkinson	↔	↔	The improved risk score reflects that, although there are still significant financial and economic headwinds that will continue to significantly impact the council going forward, there has been some improvement in forecasts and more resilience added to the council's budget going forward to help address continued areas of uncertainty. The outlook for the next 12 months is assessed as stable.
15 (0)	L:3 I:5 Score 15	L:3 I:3 Score 9	5. Cyber and Data Security Breach	D. Hodgkinson	↑	↑	The cyber security programme is progressing well with several key actions completed in the last 12 months. However, the threat level in our external environment remains high and with a continued increased forward outlook.
12 (+2)	L:3 I:4 Score 12	L:1 I:4 Score 4	6. Capital Programme slippage and/or delivery failure	Corporate Management Board (individual Corporate Directors as applicable)	↔	↔	The external economic environment has led to a significant increase to the cost of capital projects and increased risk of contractor withdrawal/failure. Slippage therefore remains a risk. In addition to a more appropriate level of capital provision, capital delivery capability and governance remains under review to mitigate delivery failure outside of affordability issues.
12 (0)	L:3 I:4 Score 12	L:3 I:3 Score 9	7. Youth Crime and Serious Youth Violence - risk of increased incidents	J. Abbey	↔	↔	There is a continued decreasing trend in serious youth violence, but serious incidents still occur and there is an increasing complexity of need. Despite progress made in Islington in this area, this risk remains dynamic and unpredictable and risk scores remains the same with a stable forward trend.

Current risk score (and change since the last report)	Current Score Likelihood x Impact	Target Score	Risk	CMB Risk Sponsor	Forward trend May 2022	Forward trend May 2023	Comment on risk trend
12 (0)	L:3 I:4 Score 12	L:2 I:2 Score 4	8. Failure to challenge and address social inequalities	N. Murtuja	↑	↑	Equality and improved outcomes for Islington residents is at the heart of the new strategic plan Islington Together 2030. The current national economic context is likely to have a negative impact on social inequality and the risk presents with a continued increasing forward trend.
12 (0)	L:3 I:4 Score 12	L:2 I:3 Score 6	9. Social care market instability cause provider failure or withdrawal	J. Everson	↑	↑	Providers continue to be heavily affected by the wider economic challenges such as cost of energy, inflation, recruitment and retention. Continued uncertainties around long-term funding for the sector means this risk continue to present with an increasing forward trend.
12 (0)	L:3 I:4 Score 12	L:2 I:4 Score 8	10. Safeguarding Adults- Failure to identify or respond to preventable harm	J. Everson	↔	↔	Adult Social Care improvement plan in place which includes recommendations identified in the Safeguarding Adult Reviews. The risk remains at the same risk score as last report with a continued stable trend.
12 (0)	L:4 I:3 Score 12	L:2 I:3 Score 6	11. Climate Change Resilience and Adaptation	Corporate Director for Environment and Climate Change	↔	↔	The net zero carbon programme is progressing well. This risk has been re-articulated to reflect that resilience and adaptation are key risk areas alongside the work to reduce carbon emissions. Climate adaptation measures are being identified by each programme workstream for incorporation in action plans going forward. The risk presents with a stable trend for the next 12 months.

Current risk score (and change since the last report)	Current Score Likelihood x Impact	Target Score	Risk	CMB Risk Sponsor	Forward trend May 2022	Forward trend May 2023	Comment on risk trend
12 (0)	L:3 I:4 Score 12	L:2 I:4 Score 8	12. Commissioning, procurement and contract management operating model fails to maximise value for money and social value outcomes	S. Biggs	↔	↔	The Council continues to monitor suppliers' viability and ability to deliver within the agreed parameters in the challenging economic climate. Delivery of the progressive procurement strategy 2020-27 is broadly on track and the forward trend is stable.
12 (0)	L:3 I:4 Score 12	L:2 I:2 Score 4	13. Health and Social Care Integration -Insufficient capacity and resource to meet need	J. Everson	↑	↑	The Council continues to work with local partners to embed new systems and on-going integration. Uncertainties around funding remains a challenge and the risk continue to present with an increasing forward trend.
12 (+2)	L:3 I:4 Score 12	L:1 I:4 Score 4	14. Serious H&S Incident (Occupational)	S. Biggs	↔	↔	Due to a concerning trend in incidents of verbal and physical abuse against Council staff and contractors, this risk has increased. A programme of training and monitoring is being put in place to address this and the trend over the coming 12 months is assessed as stable.
12 (+4)	L:3 I:4 Score 12	L:2 I:3 Score 6	15. Response & Recovery - Failure to effectively respond and recover from critical incident (organisational preparedness, resilience and business continuity)	J. Young	↔	↔	The impact of the new Protect Duty on local authorities is not fully known as final details have not yet been published. Large scale changes to the Council's business continuity arrangements are underway to strengthen resilience in the event of a critical incidents. Both these factors have contributed to the increase in risk level. The forward outlook for the next 12 months is stable.

Current risk score (and change since the last report)	Current Score Likelihood x Impact	Target Score	Risk	CMB Risk Sponsor	Forward trend May 2022	Forward trend May 2023	Comment on risk trend
10 (0)	L:2 I:5 Score 10	L:1 I:5 Score 5	16. Serious Health & Safety incident in housing (Including Fire Safety)	J. Young	↔	↔	The Council is continuing to deliver its compliance action plan in line with the new Fire Safety Act and Building Safety Act requirements. It is also delivering on actions to improve handling of damp and mould cases. This risk presents with a stable forward outlook.
10 (0)	L:2 I:5 Score 10	L:2 I:5 Score 10	17. Safeguarding Children – Safeguarding practice and provision for children and young people are ineffective	J. Abbey	↔	↔	Despite an increase in complexity of need and challenging recruitment market, the service has mitigations in place for effective safeguarding provision. The risk is presenting with a stable forward trend.
9 (-3)	L:3 I:3 Score 9	L:2 I:3 Score 6	18. Diversity and Inclusion – failure to attract and retain diverse talent	D. Hodgkinson	↔	↔	Over the last year, progress has been made across a programme of activities, and directorates now have People Plans to support the recruitment and development of a diverse and inclusive workforce. This risk is therefore assessed as reduced with a stable forward trend.
9 (-3)	L:3 I:3 Score 9	L:3 I:3 Score 9	19. Serious information breach or non-compliance with legislation	D. Hodgkinson	↔	↔	Work continues to strengthen the Council's approach in handling Freedom of Information requests and Subject Access Requests. Since the last report, there has been one serious data breach reported to the regulator ICO which was closed with no action against the Council. The risk score has been adjusted to reflect the impact of this risk. The risk presents with a stable forward trend.

Current risk score (and change since the last report)	Current Score Likelihood x Impact	Target Score	Risk	CMB Risk Sponsor	Forward trend May 2022	Forward trend May 2023	Comment on risk trend
9 (0)	L:3 I:3 Score 9	L:2 I:3 Score 6	20. Domestic Violence Abuse – failure to provide effective practice and provision for victims	J. Abbey / J. Young	↔	↔	There has been a steady increase in referrals, with incidents of severe violence also on the rise. The Council has made significant investments in the service and is well placed to respond and continue to work with partner organisations to support victims. The forward trend is therefore assessed as stable.
9 (0)	L:3 I:3 Score 9	L:2 I:2 Score 4	21. Well managed workforce to deliver corporate priorities	D. Hodgkinson	↓	↓	The new performance management framework was launched in April 2023 and a new programme for managers will be rolled out by the end of 2023. While progress has been made, the new framework needs to be embedded before risk levels can reduce. The forward outlook is assessed as improving over the next 12 months.
8 (0)	L:2 I:4 Score 8	L:2 I:2 Score 4	22. Pupil attainment gap - Systemic failure to promote attendance and quality provision and interventions	J. Abbey	↔	↔	2022 results created a new baseline for attainment post-Covid. Overall outcomes were lower in 2022 compared to pre-pandemic results but with some results consistent or better than national averages. The Council continues to deliver its Education Plan and the forward trend remains stable.
8 (+2)	L:4 I:2 Score 8	L:2 I:2 Score 4	23. School viability and place planning - Failure to manage the demand of school places could impact the pattern of provision and schools' viability	J. Abbey	↔	↑	The trend of reduced demand for school places continues, with increasing pressures on school budgets. The Council continues to implement its school organisation plan to manage place planning and is increased monitoring of school budgets. A number of Islington schools are projected to go into deficit and therefore this risk is presenting with increased risk score and forward outlook.

Current risk score (and change since the last report)	Current Score Likelihood x Impact	Target Score	Risk	CMB Risk Sponsor	Forward trend May 2022	Forward trend May 2023	Comment on risk trend
6 (-3)	L:3 I:2 Score 6	L:2 I:2 Score 4	24. Change Programme Delivery – corporate governance arrangements may not be fully embedded	N. Murtuja	↔	↔	The Transformation Team is undergoing a restructure to support a more strategic alignment with the priorities set out in Islington Together 2030 and improved resources to support change delivery. With the new approach to programme governance, it is assessed that the risk has reduced since the last report. The forward outlook remains stable.
6 (-3)	L:3 I:2 Score 6	L:2 I:2 Score 4	25. Effective IT Transformation and Resilience	D. Hodgkinson	↔	↔	Most of the critical resilience projects have been completed, including a full power down of 222 Upper Street data centre. The risk score is therefore assessed as reduced and the forward trend is stable.
6 (0)	L:3 I:2 Score 6	L:2 I:2 Score 4	26. Serious fraudulent activity	D. Hodgkinson	↔	↔	The team has increased its capacity and will develop a programme of proactive anti-fraud reviews for 2023/24. The risk exposure remains the same with a stable forward outlook.
5 (-5)	L:1 I:5 Score 5	L:1 I:5 Score 5	27. Non-Recent Child Abuse – Failure to deliver support payment scheme	J. Everson	↔	↔	The payment scheme was launched in May 2022 and has been running well over the last year. Mitigations against fraudulent claims were pro-actively addressed in the design phase of the scheme. This risk is therefore assessed as reduced with a stable trend.
4 (new)	L:2 I:2 Score 4	L:1 I:1 Score 2	28. Increasing homelessness pressures cause burden on Council's budget and hardship for affected residents	J. Young	-	↑	There is a national trend in increasing numbers of people facing homelessness. In Islington as of 31 st March 2023 there were 1,029 homeless households living in temporary accommodation compared to 848 homeless households the same time in 2022. Whilst the service is managing current pressures, the rapid increase and uncertainty around future Government funding gives rise to an increasing forward trend.

Appendix 5: Principal Risk detailed information and action plans (risk on a page)

Risk Information Risk Title – 1. New Build Programme	Risk Scores	Existing Controls				
<p>Risk Affordability challenges slow progress in delivering new council homes. Unable to deliver the 2023-2027 programme target of 750 new affordable homes started on site by December 2027.</p> <p>Cause:</p> <ol style="list-style-type: none"> 1. Financial climate including interest rates and inflation, cost increases, continued lack of funding to support housing delivery, external market factors, funding model for the programme 2. Contractor failure 3. Delay in planning approval 4. Lack of resident support <p>Consequence Reputational damage, loss of opportunity for residents, increase in housing issues in the borough.</p> <p>Risk Update The target of 750 new council rent homes to be started on site before December 2027 was set in October 2021 based on the data and insight available at the time. Since this time there have been significant changes in the delivery environment. Wider events affecting the national economy, including high inflation and interest rate rises, have led to a significant increase to the cost of building new homes and construction costs are now at a 40-year high. There is a lack of government funding to support the delivery on new homes. Some of our current contractors have been open regarding their inability to offer fixed price contracts going forward. Delaying in getting viable schemes through the planning process may result in increased costs leading to unviable schemes. The New Build programme is driven by the needs of our residents, but concerns around disruption and potential dislocation may weaken resident support for specific schemes.</p>	<p>Current Score: L:4 (+1) I:5 +1)</p> <p>Target Score: L:3 I:5 (+2)</p> <p>Gap to target: L:1 I:0</p>	<ol style="list-style-type: none"> 1. A Strategic Pipeline Group has been set up to ensure a pipeline of viable schemes comes forward into the 2023 – 2027 programme. A programme assurance framework and programme level controls will mitigate against cost overspends 2. Regular contact with contractors and review of their ability to manage risk. Working with employers’ agents to understand industry trends. 3. The New Build programme has been moved into the Community Wealth Building (CWB) Directorate and will now work directly alongside planning colleagues. Lessons learnt from schemes in the 2018 – 2022 programme will feed into planning applications for new schemes. 4. As part of the move into the CWB Directorate there will be a review of the resourcing required to deliver the 2023-2027 programme and this will include consideration of more specialist resident engagement resources, particularly in regard to the delivery of larger estate transformation opportunities. 				
<p>Actions</p>	<p>Expected impact</p>	<p>Resources required</p>	<p>Owner</p>	<p>Due Date</p>	<p>Status</p>	
<p>A paper for Executive will set out mitigations across the programme, including recommendations to cease the most unviable schemes, explore scheme options across general fund, commence feasibility on the potential for long term estate transformation sites, and assess potential for generating additional funding.</p>	<p>Reduce Likelihood and Impact</p>	<p>Staff</p>	<p>S. Biggs</p>	<p>Sept 2023</p>	<p>In Progress</p>	
<p>Ongoing monitoring of the risk of not being able to deliver the programme and the risk to the HRA from the programme’s financial commitments.</p>	<p>Reduce Impact</p>	<p>Staff</p>	<p>S. Biggs</p>	<p>Ongoing</p>	<p>In Progress</p>	

Risk Information Risk Title – 2. Financial Resilience of Residents	Risk Scores	Existing Controls			
<p>Risk – Failure to appropriately support residents to be financially resilient</p> <p>Cause - Government policy, global events, cost of living crisis, wider economic environment.</p> <p>Consequence - Vulnerable residents fall into significant new financial hardship. Evictions/ homelessness may increase. Declining physical/emotional wellbeing of residents. Arrears/economic hardship may increase the debt position towards the Council, reducing ability to fund services.</p> <p>Risk Update – The Council continues to deliver a range of actions to support the financial resilience of residents. The Council’s Resident Support Scheme paid £1.5m to vulnerable residents in the 2022/23 financial year. This scheme is targeted at residents experiencing a financial crisis due to exceptional circumstances with no other support available to them. The first two Household Support Funds distributed £4.4m from September 2021 to September 2022 to help residents with cost-of-living issues. The third Household Support Fund round was fully distributed by year end 22/23 to a total of £6.6m. In total, around 20,000 households have received support from each round of the Household Support Fund, including payments during school holidays for families eligible for free school meals and supporting our least financially resilient households. The Council has also launched the Islington Hardship Fund of £1m of support available to households not eligible for any of the available schemes. Following the success of the Pension credit take-up campaigns, which has resulted in additional annual take-up to the value of around £1.96m, the Income Maximisation (IMAX) team is planning more pro-active work to support residents to claim benefits they are entitled to. The IMAX team have built on the overall £5.1m of annual benefit entitlement they helped residents claim in 21/22 and achieved £5.8m in 22/23. The Council has also distributed £13m through the Council Tax Rebate (CTR) to those most in need. Additional investment in our CTS scheme in 22/23 has been maintained for 23/24 providing up to 95% support for working age residents. For 24/25 we are exploring a banded scheme with up to 100% support. The Government has announced that support to vulnerable households will continue in 2023-24 via Household Support Fund 4 with the funding for Islington expected to be around £4.4m. The uprating of benefits and the benefit cap in line with inflation will support residents’ financial resilience through next year. Alongside a focus of encouraging residents to claim benefits that they are entitled to, the Council continues to support residents into employment, or better employment, for longer term financial resilience. The support put in place has helped position the Council to make effective interventions to support the community with the cost-of-living crisis.</p>	<p>Current Score: L:4 I:4</p> <p>Target Score: L:3 I:3</p> <p>Gap to target: L:1 I:1</p>	<ol style="list-style-type: none"> 1. Cost of Living Board, fortnightly meetings of the Council and Voluntary and Community Sector partners to monitor activities. 2. Residents Support Scheme provides a safety net covering crisis awards, community care awards (household goods), discretionary housing payments and council tax welfare for severe financial hardship. 3. Data led approach to making pro-active contact with cohorts of residents who appear entitled to additional benefits. 4. Benefit take-up campaigns. 5. Council Tax Support policy provides support to low-income households. Help for working age households increased for 22/23 and 23/24. 6. A claim for universal credit is treated as a claim for council tax support. 7. Co-ordinated cross council approach to working our partners to support residents, including partnership work with voluntary sector to provide access to employment advice and access to food banks for residents in need. 8. Government hardship grants distribution. 9. Communication strategy on cost-of-living support targeting residents and staff 10. 'Make Every Contact Count' training for staff 			
<p>Action</p>	<p>Expected impact</p>	<p>Resource required</p>	<p>Owner</p>	<p>Due Date</p>	<p>Status</p>
<p>Fully utilise Residents Support Scheme funds to provide a safety net to low-income households</p>	<p>Reduce I</p>	<p>Staff/IT</p>	<p>S. Biggs</p>	<p>Ongoing</p>	<p>On track</p>
<p>Launch further benefit take up campaigns to maximise residents’ income</p>	<p>Reduce I</p>	<p>Staff/IT</p>	<p>S. Biggs</p>	<p>Ongoing</p>	<p>On track</p>
<p>Distribute Government grants including Household Support Fund to those most in need</p>	<p>Reduce I</p>	<p>Staff /IT</p>	<p>S. Biggs</p>	<p>Ongoing</p>	<p>On track</p>
<p>Continuously refine communication strategy on financial resilience and available support and advice</p>	<p>Reduce I</p>	<p>Staff/IT</p>	<p>S. Biggs</p>	<p>Ongoing</p>	<p>On track</p>

Risk Information Risk Title – 3. Cost of Energy	Risk Scores	Existing Controls			
<p>Risk Sustained high and increasing energy costs, and longer-term volatility of energy markets, cause budget pressures for the Council, Schools and residents on the Council’s communal heating systems and Bunhill heat network</p> <p>Cause Sustained high prices in the global energy market, performance of public buying organisation (LASER), services do not adapt budgets and activities to meet pressure in energy expenditure.</p> <p>Consequence Significant overspend on Council budget, key projects and programmes scaled down, paused or cancelled, savings targets not met</p> <p>Risk Update: This risk has stabilised since summer 2022 following the Council joining the public buying organisation LASER. LASER had already purchased most of its energy for 2023/24 at significantly better rates than the market prices at the time. At the time the Executive took the decision to make this change, the estimated saving for 2023/24 was £13m compared to buying on the open market, significantly reducing the Council’s exposure to market volatility. There is a slight increase in energy cost expected for 2023/24 (compared to 2022/23) but costs for 2024/25 are not yet known at the time of writing. Volatility and prices in the energy markets have reduced in recent months. The Council is progressing action on reducing energy consumption, including providing advice and making recommendations to schools. Up to the end of Q3, savings of £2.4m were achieved against expected spend on electricity and gas, which was higher than the expected savings identified in the Corporate Energy Savings Programme. This programme was being overseen by a monthly Energy Board chaired by the Chief Executive, and has now become a BAU element of the net zero programme. Although the risk profile has slightly improved overall – rather than volatility and unknown levels of prices, the main issue now is sustained high prices – there remains a high level of uncertainty of energy costs beyond 2024/25.</p>	<p>Current Score: L: 3 (-1) I: 5</p> <p>Target Score: L: 3 I: 4</p> <p>Gap to target: L: 0 I: 1</p>	<ol style="list-style-type: none"> 1. Contract in place with public buying organisation LASER 2. Corporate Energy Savings Programme now considered BAU. 3. Annual monitoring and targeting visits and reports produced by Energy Services team 4. Communications plan to encourage staff to minimise energy use in Council buildings. 5. Installation of smart meters in council buildings to identify time of energy usage 			
Action	Expected impact	Resources required	Owner	Due Date	Status
Develop purchasing strategy for 2025/26 onwards (when LASER contract ends)	Reduce overall score	Staff	Corporate Director for Environment and Climate Change	End summer 2023	In progress
Accelerate installation of smart meters in Council buildings	Reduce overall score	Staff		Ongoing	In progress
Corporate Energy Savings Programme activities	Reduce overall score	Staff		Ongoing	In progress

Risk Information Risk Title – 4. Financial Stability and Resilience	Risk Scores	Existing Controls			
<p>Risk - Significant overspends/budget gaps.</p> <p>Cause – High and sustained inflationary pressures on pay and non-pay budgets (particularly energy costs), rising demand for council services and uncertainty around local government funding.</p> <p>Consequence - Unable to set balanced/robust budget and depletion of reserves.</p> <p>Risk Update - The budget setting process for the 2023-24 financial year was particularly challenging amidst significant economic and political uncertainty. Specific challenges included: A significant 3-year General Fund budget gap that started at £61m; Legacy cuts to our funding settlement since 2010, that have an ongoing impact, despite a headline increase in social care funding in the 2023-24 local government finance settlement and additional council tax flexibility; Continued significant expenditure pressures on pay, contracts and energy. The headline funding allocations in the 2023-24 local government finance settlement were offset by the additional budgetary pressures and risks, and the ongoing effect of sustained government funding cuts on net budgets. This is primarily a result of inflation remaining high for longer and social care pressures growing faster than previously anticipated. Following an extensive savings identification and appraisal/consultation process, the 2023-24 budget proposals to balance the budget were agreed by Full Council on 2 March 2023. Provision was made to enable a greater degree of financial resilience ahead of the 2023-24 financial year, such that the significant and ongoing inflationary pressures are more likely to be contained within the overall budget envelope, going forward. The economic forecasts in the Spring Budget 2023 look more favourable as regards the inflation outlook, but with potential still for volatility. Possible local government funding reforms look to have been pushed back until at least 2025-26; the first year of the next Spending Review. This provides a further financial uncertainty over the medium term. The improved risk score reflects that, although there are still significant financial and economic headwinds that will continue to significantly impact the council, there has been some improvement in forecasts (e.g. national inflation estimates) and more resilience added to the council’s budget going forward to help address continued areas of uncertainty. A two-year funding envelope for the financial years 2023/24 and 2024/25 assists with forward planning (albeit not addressing historic funding shortfalls), although considerable uncertainty remains from 2025/26 and beyond.</p>	<p>Current Score: L:3 (-1) I:5</p> <p>Target Score: L:2 I:2</p> <p>Gap to target: L:1 I:3</p>	<ol style="list-style-type: none"> 1. Developing the budget estimates is a council-wide process which takes into account the most recent budget monitoring information and the latest assumptions, informed by financial modelling from external financial advisors. 2. Savings to balance the budget are reviewed and signed off as deliverable by key stakeholders. The thoroughness of this process is a key source of assurance in determining that overall estimates in the budget are robust and that financial reserves are adequate. 3. The council’s budget is underpinned by several key MTFS principles related to financial resilience. A self-assessment against the CIPFA Financial Management Code is undertaken annually and shows a continued, high level of compliance. 4. The council’s recurrent budget includes a £5m per annum general contingency budget, a £5m Inflation, Energy and Demand contingency budget, a £4.8m energy provision and a £4m per annum replenishment of financial reserves. In addition, Directorates agree ongoing cash limited budget allocations and take responsibility for delivering a balanced budget unless a business case for an exceptional circumstance for contingency funding is agreed. 5. The in-year financial monitoring position is reported to Corporate Management Board, the Executive and the Policy and Performance Scrutiny Committee (PPS) at regular intervals. 6. The council responds to government funding consultations and lobbies through London Councils, the Society of London Treasurers and the LGA on key funding issues. 			
<p>Actions</p>	<p>Expected impact</p>	<p>Resources required</p>	<p>Owner</p>	<p>Due Date</p>	
<p>Evolving and enhanced budget setting process reflecting the ongoing need for significant savings required to balance the budget over the medium term.</p>	<p>Reduce likelihood</p>	<p>Staff</p>	<p>D. Hodgkinson</p>	<p>Ongoing</p>	
<p>Energy Board to consider energy purchasing strategy and forecasts.</p>	<p>Reduce overall score</p>	<p>Staff</p>	<p>D. Hodgkinson</p>	<p>Ongoing</p>	

Risk Information Risk Title – 5. Cyber and Data Security	Risk Scores		Existing Controls		
<p>Risk - Process Control Networks and/or Critical Information Assets may be compromised</p> <p>Cause - Computer-based unauthorised access or malicious modification of code</p> <p>Consequence - Denial of Service, data breach, reputational damage, disruption of service(s)</p> <p>Risk Update Ongoing activities continue to improve our defence in line with previously reported programmes. More systems have been migrated to a cloud environment and are now sitting outside our data centres which reduces the likelihood and impact on an attack. The initiative to move the secondary data centre out of Newington Barrow Way to Azure and other third-party hosting is progressing well. Basic controls such as two-factor authentication and geo-fencing remain important protection from phishing and hacking. The ongoing staff programme of cyber education is effective with more 'discerning' reporting of suspicious emails. The Migration of the Taranto Parking system to cloud environment significantly reduces the risk of attack through the Old St premises.</p>	<p>Current Score: L:3 I:5</p> <p>Target Score: L:3 I:3</p> <p>Gap to target: L:0 I:2</p>		<ol style="list-style-type: none"> 1. Islington council has all of the normal cyber security controls expected on an organisations network. Such as access controls, computer controls, anti-virus controls, email and web filtering, firewalls, Denial of service protection, backup controls. 2. These controls are supported by processes such as service delivery, change control processes, technical design processes which are operated by IDS personnel. Together these manage the organisations cyber security risk. 3. These controls are regularly monitored, tightened and improved to deal with the changing levels of threat. 4. Data (at-rest) on PC's is protected by encryption (MS BitLocker) and data exchanged between PC's WFH and the Council's network is protected by VPN/TLS (in-transit) encryption. 5. Security Incident and Event Monitoring Service (SIEM) in place 		
Action	Expected impact	Resources required	Owner	Due Date	Status
Completion of the decommissioning of Newington Barrow Way datacentre and the removal of all non-site-specific IT from 222 Upper Steet data centre.	Reduce Impact	Staff	D. Hodgkinson	Sept 2023	In Progress

Risk Information Risk Title – 6. Capital Programme Slippage and/or Delivery Failure	Risk Scores	Existing Controls			
<p>Risk Failure to adequately manage capital programmes (cost/schedule/receipts)</p> <p>Cause Inadequate governance and project management</p> <p>Consequence Financial Loss, breach of governance/regulation, reputational damage</p> <p>Risk Update: The Council committed to a new Corporate Asset Strategy in March 2020. It is designed to deliver a strategic, long-term approach to managing and enhancing our community asset base. The Capital Strategy and Capital Programme was approved as part of the budget setting programme at full Council in March 2023. The total expected spend over 2023/24 – 2025/26 is £474 million. The Capital investment will be used in the following areas: - Decent and affordable homes - Jobs and opportunity - A safer Borough for all - Greener and Cleaner Islington - Enhancing Community Assets</p> <p>The external economic environment, with high inflation and interest rate rises, has led to a significant increase to the cost of building new homes and increased risk of contractor withdrawal/failure. Slippage therefore remains a risk. In addition to a more appropriate level of capital provision, capital delivery capability and governance has materially increased in the last 2 years, helping to mitigate delivery failure outside of affordability issues</p>	<p>Current Score: L:3 (+1) I:4 (-1)</p> <p>Target Score: L:1 I:4</p> <p>Gap to target: L:2 I:0</p>	<ol style="list-style-type: none"> 1. Major Projects Board 2. Corporate Asset Delivery Board monthly meetings, chaired by the Leader of the Council 3. Housing Delivery Board 4. Council Scrutiny processes 5. A common set of project level and programme/directorate level reporting will be implemented to ensure consistency and robust delivery tracking 6. Enhanced Reporting and monitoring of capital spend as part of the monthly monitoring. 7. Capital receipts controls – We maintain a regular review of the property market and have been prudent in our financial assumptions. Timing delays can largely be managed through the use of HRA reserves. In the event of a decrease in projected capital receipts, the new build programme would need to be re-assessed in line with the overall available funding. 			
<p>Action</p>	<p>Expected impact</p>	<p>Resources required</p>	<p>Owner</p>	<p>Due Date</p>	<p>Status</p>
<p>Ongoing monitoring of progress and delivery</p>	<p>Reduce overall score</p>	<p>Staff</p>	<p>CMB</p>	<p>Ongoing</p>	<p>In progress</p>
<p>Update process for completing business cases and the Gateway process for approving capital projects.</p>	<p>Reduce overall score</p>	<p>Staff</p>	<p>Director of Finance</p>	<p>July 2023</p>	<p>In progress</p>

Risk Information Risk Title – 7. Youth crime and serious youth violence	Risk Scores	Existing Controls			
<p>Risk - Increased incidents of youth crime and serious youth violence and a complexity of need, impact on the council’s ability to respond adequately. A perceived failure to respond adequately to/prevent crime involving young people, despite extensive investment in services & well publicised plans.</p> <p>Cause - Early childhood trauma, disrupted attachment may lead to children unable to self-regulate; therefore, more likely to offend. Contextual factors e.g. living in high crime neighbourhoods, poverty and discrimination. Interventions are not sufficiently tailored or impactful.</p> <p>Consequence - Media coverage contributes to fear of crime, negative attitudes towards young people compounding the issues they face. More young people in criminal justice system and disproportionate impact on BAME communities</p> <p>Risk Update - The Council has made significant strides reducing the number of young people given custodial sentences, becoming first time offenders and the percentage of repeat offenders. The decreasing trend in serious youth violence and knife crime continues across in Islington but there are still serious incidents. The team is monitoring trends closely due to concerns over the impact of the cost-of-living crisis. The Council’s investment in early intervention and prevention may play a part in the stable trend of incidents. Capacity is being increased for the Integrated Gang Team and Targeted Youth Support to enable more preventative work, including in schools to raise awareness of the tactics gangs use to recruit new members. The implementation of the Youth Safety Strategy is progressing and being monitored by the strategic board that is the Youth Justice Services Management Board (YJSMB). This a dynamic risk that is unpredictable and external factors for this risk remain challenging.</p>	<p>Current Score: L:3 I:4 Target Score: L:3 I:3 Gap to target: L:0 I:1</p>	<ol style="list-style-type: none"> 1. Youth Safety Strategy 2020-25, focused on protecting our children and young people from violence, abuse and exploitation. It includes a comprehensive partnership action plan that is overseen by the YJSMB and the Youth Safety Delivery Group to keep track of progress and drive improvements, hand-in-hand with community partners and statutory organisations. The strategy builds upon our practice models especially the trauma informed approach and is based on our own academic research about ‘what works’. There is robust monitoring in place of this multi-agency strategy, with quarterly monitoring on strategy metrics and targets and also monitoring against national data sets. 2. The Violence Reduction Unit (VRU) Parental Support project in Islington and Camden extended until March 2025. 3. VRU used to sustain the Transition to Secondary school project. and to now supporting families affected by child to parent violence 4. The Met Police Violence Suppression Unit (VSU) dealing with high harm offenders and groups with covert operations continuing. 5. Co-location of 2 police officers in Community Safety & ASB teams ASB early warning system to collect information on emerging issues that are shared with our partners. 6. Integrated Gangs Team – a collaboration with the police to share intelligence and joint working. Collaboration with other boroughs also takes place 7. The Targeted Youth Support Team working with youth at risk of entering the justice system. 			
Action	Expected impact	Resources required	Owner	Due Date	Status
Implementation of the Youth Safety Strategy	Reduce impact and likelihood	Staff	J. Abbey	2025	In Progress

Risk Information Risk Title – 8. Social Inequalities	Risk Scores	Existing Controls				
<p>Risk - Failure to challenge and address social inequalities in Islington</p> <p>Cause - Poor prioritisation, lack of clear governance, and/or detailed project/programme management, broader external social issues/change leading to increasing inequalities</p> <p>Consequence - Loss of community confidence in the Council. Poor outcomes for residents.</p> <p>Risk Update - The Islington Together 2030 plan was launched in March 2023. Improving outcomes for all residents is at the heart of the plan, with targeted focus on social inequality to drive progress in this area. Over 6000 residents engaged with the Council's community engagement programme in 2022 to help shape and inform the 2030 strategic plan. In 2023, stakeholders will take part in action learning workshops taking an inclusive approach to identify actions in support of delivering the outcomes that residents have said are most important to them. This collaborative approach is designed to develop creative and innovative solutions with collaboration with stakeholders and the community.</p> <p>The Public Health intelligence team is developing a wellbeing index for the borough which will be a cross-council tool and is expected to be in place by October 2023. Wellbeing indicators will be reported to the Islington Together Board to monitor the wellbeing of residents and the impact council interventions are having on improving wellbeing.</p> <p>The current social context with the cost-of-living crisis is likely to increase inequalities in society and the Council's efforts is focused on rebuilding systems and addressing systemic inequalities to achieve sustained change for the future.</p>	<p>Current Score: L:3 I:4</p> <p>Target Score: L:2 I:2</p> <p>Gap to target: L:1 I:2</p>	<ol style="list-style-type: none"> 1. Islington Together Board monitoring delivery and impact of 2030 plan 2. Challenging Inequality Programme to drive action across the Council, ensuring the equality agenda remains a priority for the Council. 3. Challenging Inequality programme board 4. Directorate Equality Leads 5. Clear Programme plan - including as employer, strategic leader and as a service provider. 6. Through the boards, will be monthly progress and review. 7. Race Equality Staff Network 8. Challenging Inequality Member Working Group (member led) 9. Disability forum 10. LGBT network 11. Women's network 12. Challenging Inequality Coalition with community 				
Action	Expected impact	Resources required	Owner	Due Date	Status	
Implement action learning approach for key priority outcomes	Reduce Likelihood	Staff/Policy	N. Murtuja	March 2024	In progress	
Continue engagement with our communities	Reduce Likelihood	Staff	N. Murtuja	Ongoing	In progress	
Develop wellbeing index and strengthen corporate performance monitoring	Reduce Likelihood and Impact	Staff	N. Murtuja/ Public Health Intelligence	Ongoing	In progress	

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Risk Information Risk Title – 9. Social Care Market Instability	Risk Scores	Existing Controls				
<p>Risk - Significant provider failure/ withdrawal of providers Cause - Financial strains causing providers to withdraw from the market Consequence - Safeguarding risks to individuals, Financial. Risk Update – Increase cost of energy, LLW and inflation continues to have a significant impact on the cost of care, provider instability and costs to the Council. There is some risk that Providers will ask for uplifts to services that are beyond the financial envelope the Council has been able to account for. Rising demand and complexity further impacts on delivery. Workforce issues remain with providers carrying some vacancies, although Islington Providers appear to be sustaining adequate workforce levels currently this is a significant issue elsewhere, including in neighbouring boroughs. Furthermore, the Council is currently relying on a number of spot purchased homecare providers following provider failure of two block contract providers during the pandemic. The Homecare Provider market is more volatile than other parts of the market. The government continues to fail to agree a long-term settlement for ASC funding which means identifying long term solutions with Providers is more challenging and the announcement in early April 2023 that funding previously promised has been significantly reduced, particularly the funding supporting the workforce, will provide even further challenge.</p>	<p>Current Score: L:3 I:4 Target Score: L:2 I:3 Gap to target: L:1 I:1</p>	<ol style="list-style-type: none"> 1. We continue to work with the provider market to ensure as wide a range of providers as possible to reduce the risk of adverse impact if providers withdraw from the market 2. We continue to work across NCL to secure additional care home capacity at times of increasing pressure (winter and surges). 3. We have regular provider forums, a provider bulletin, Care Home forums and Commissioners continue to maintain strong relationships with Providers. 4. We have a robust uplifts process, aligned with NCL where we can and are implementing the use of Care Cubed even further to calculate the cost of care. 5. We have contingency plans in place to manage either provider failure or provider withdrawal from the market. 6. We have now developed our new model of Homecare in partnership with operational colleagues, residents and Providers and will be going out to tender early this financial year. 7. There are a number of workforce initiatives underway across Islington and North Central London to promote social care careers and workforce development. 8. We continue to pay for London Living Wage 9. Regular contract monitoring that now includes monitoring of spot contracts where we have high volumes of residents drawing down care and support from them or where there are risks and helps alert us of risks early. 				
Action	Expected impact	Resources required	Owner	Due Date	Status	
Monitoring of the local and national provider market	Reduce Likelihood	Staff	J. Everson	Ongoing	In progress	
Collaboration across North Central London with local authority and NHS colleagues to support the social care market and workforce.	Reduce Impact	Staff	J. Everson	Ongoing	In progress	
Completing the Homecare procurement	Reduce Impact	Staff	J. Everson		In progress	
Further implementation of Care Cubed	Reduce Impact	Staff	J. Everson	Ongoing	In progress	
Robust uplifts process	Reduce Impact	Staff	J. Everson		In progress	
Recruit to specialist negotiator role	Reduce Impact	Staff	J. Everson		In progress	

Risk Information Risk Title – 10. Safeguarding Adults	Risk Scores	Existing Controls			
<p>Risk - Failure to fulfil our statutory obligation to identify or respond to significant preventable harm to adults at risk of abuse</p> <p>Cause - Provider Failure, significant provider concerns around quality of care, Non-Compliance with procedures, inadequate IT systems.</p> <p>Consequence - Risk to Individual, Reputational. Financial, CQC inspection</p> <p>Risk Update – Adult Social Care (ASC) improvement plan in place which includes recommendations identified in the Safeguarding Adult Reviews. ASC Improvement Steering group meets bi-weekly and provides oversight of actions taken and their impact on practice. Majority of the safeguarding enquiries have robust risk assessments, safeguarding plans and are person centred with evidence of making safeguarding personal. The weekly safeguarding closure panel and surgery ensures departmental oversight of cases and provides an opportunity to revisit any gaps in practice prior to closure. It is promoting reflective social work practice. This is improving social work and safeguarding practice within teams. Staff have stated that they feel supported through the surgery and have noticed an improvement in their practice and knowledge. The weekly safeguarding surgery has also ensured that challenging cases do not become stuck and drift as it provides a space for practitioners to discuss these cases. A number of topic-specific safeguarding practice guides have been created and issued to staff. Case file audits also show an improvement in a number of critical areas of practice like risk assessment, mental capacity and making safeguarding personal. Through Integrated Multi-Disciplinary Quality Assurance Meeting (IQAM) we have created a quality assurance process for all packages of care and placement decisions. Development and introduction of the PowerBi Safeguarding Dashboard in 2022 has improved transparency and accuracy of safeguarding data which has enhanced oversight. We can monitor safeguarding performance on a daily basis. It gives both a micro as well as a macro view of safeguarding performance. The ISAB and the ISCP (Islington Safeguarding Children Partnership) are working together to improve the experience of vulnerable young adults transitioning into adult care through the Transitional Safeguarding joint steering group. The ISAB launched the Creative Solutions Panel in 2022 for high-risk multi-disciplinary cases that do not fit the criteria of any existing panel.</p>	<p>Current Score: L:3 I:4</p> <p>Target Score: L:2 I:4</p> <p>Gap to target: L:1 I:0</p>	<ol style="list-style-type: none"> 1. Adult Social Care is represented at the Safer Islington Partnership, ISAB, ISCP, MARAC Steering Group, VAWG Board, and PREVENT 2. There is continuous cycle of placement reviews and monthly case audits. 3. Ongoing Safeguarding Adults case audits. 4. Monitoring the Safeguarding KPIs. 5. Development of the PowerBi Safeguarding Dashboard which helps in monitoring safeguarding performance. 6. Monthly Safeguarding and MCA Practitioner forum and bi-monthly Leaders in Safeguarding forum. 7. Islington Safeguarding Adults Board (ISAB), this has helped us to improve our joint working and strategic decision making. 8. Islington Provider Quality Board is a monthly Meeting with those involved in registered care settings including partners in health and CQC - early-stage intervention and escalation. 9. Quality Assurance Framework for Adult Safeguarding has been incorporated into a new department wide Quality Assurance Framework 10. Safeguarding Adults procedure and relevant ADASS guidance in place. 11. Interactive training for staff on implementing the Mental Capacity Act and Safeguarding Adults in practice 12. Weekly Safeguarding Closure Panel and Surgery are in place since 2021. 13. The Safeguarding Adults Board has developed the Creative Solutions Panel from July 2022 for high-risk multi-disciplinary cases. 			
Action	Expected impact	Resources required	Owner	Due Date	Status
Implementing Making Safeguarding Personal using a Trauma Informed Approach.	Reduce L	Staff	J. Everson	Ongoing	In progress
Strengthen Mental Capacity Act practice	Reduce L	Staff	J. Everson	Ongoing	In progress
Modern Day Slavery - rolling out a specialised training and guidance package for staff	Reduce L	Staff	J. Everson	Ongoing	In progress
Preparing for delivery of training for the new Liberty Protection Safeguards to all relevant staff once the new Code of Practice is published.	Reduce L	Staff	J. Everson	Delayed	Planned

Risk Information Risk Title – 11. Climate Change Resilience	Risk Scores	Existing Controls			
<p>Risk - The Council and the borough does not achieve the necessary climate mitigation and adaptation measures in response to the climate emergency. According to climate risk modelling by Mayor of London and Bloomberg, Islington is amongst six boroughs at particularly high risk from the effects of climate change.</p> <p>Cause - Lack of climate adaptation and mitigation measures implemented within the council’s Net Zero Carbon strategy; Resource and/or funding constraints (access to external funding) to deliver the Net Zero Carbon Strategy; Lack of supportive national policy and funding for decarbonisation; Lack of influence over key stakeholders (local/national)</p> <p>Consequence - Flood risks to communities, businesses and infrastructure; risks to health, well-being and productivity from higher temperatures and poor air quality; risks of water deficits in public water supply, and for energy generation and industry, with impacts on freshwater ecology; disadvantaged communities will be disproportionately affected by climate change impacts; reputational impact of failing to meet net zero carbon target.</p> <p>Risk Update: The net zero carbon (NZC) programme is progressing well, with eight delivery work streams, each headed by a service director and supplemented with work stream leads. The dedicated programme delivery team is now in place with a Director, a Head of Service, three strategic business managers, a programme support officer, a communications officer, a green economy officer, an officer for housing and buildings, a net zero planning officer, a non-road mobile machinery officer and a finance officer. Plans for establishing a Citizens Panel and associated in person and digital engagement have been developed for delivery this year. The Council focused from last summer on a corporate energy savings programme and is scoping prioritised/phased delivery plans to retrofit all council owned buildings in the borough as well as is developing a programme to support decarbonisation within the private sector. We continue to seek external funding for carbon reduction initiatives (e.g. install double glazing, insulation). The current and expected increases in fuel prices will increase carbon cost and could result in accelerate progress towards renewables. The council is currently assessing the carbon impact of its existing delivery plans to review and refine the Strategy. Relevant climate adaptation measures are being identified by each workstream for incorporation in to NZC action plans going forward.</p>	<p>Current Score: L:4 I:3</p> <p>Target Score: L:2 I:3</p> <p>Gap to target: L:2 I:0</p>	<ol style="list-style-type: none"> 1. Net Zero Strategy and implementation programme in place. 2. Quarterly Net Zero Carbon (NZC) executive board meetings in place to provide strategic oversight, escalation, approvals and reporting. 3. Alignment and interface between the NZC exec board and the Housing delivery board. 4. Monthly net zero carbon programme board meetings to report on progress; manage risk, issues and dependencies across the programme. 5. Delivery of a cycle of presentations on NZC themes at the scrutiny committee meeting to provide oversight, engagement and reporting. 6. The Council is the lead authority on the Renewable Power work stream on the London Councils climate change programme – opportunity to influence at the regional level 7. Annual reports on progress against the Net Zero Strategy and detailed reports are presented to Scrutiny Committee quarterly. 			
Action	Expected impact	Resources required	Owner	Due Date	Status
Develop community engagement tools and mechanisms e.g Citizen’s Panel and associated engagement opportunities.	Reduce L	Staff/Budget	Corporate Director for Environment and Climate Change	Sept 2023	In progress
Strategic review of carbon offset funding, and development of a broader financial strategy that will support and contribute to the delivery of priority requirements for the programme	Reduce L	Staff		Ongoing	In progress
Develop benefits realisation framework to enable effective impact monitoring (carbon monitoring and other KPIs) for the programme	Reduce L	Staff/Budget		Ongoing	In progress
Deliver London wide work-plans in our role as lead authority for Renewable Power on the London councils climate change programme	Reduce L	Staff		Dec 2023	In progress

Risk Information Risk Title – 12. Commissioning, procurement and contract management operating model fails to maximise value for money and social value outcomes	Risk Scores	Existing Controls			
<p>Risk – Procurement and commissioning operating model not sufficiently robust and strategic to fully realise the Progressive Procurement Strategy 2020/27. The operating model may not be fit-for-purpose and is not in line with the centralised approach to Category Management, dealing with procurement and supply issues within the Progressive Procurement Strategy 2020/27.</p> <p>Cause - Ineffective/Non-compliance with corporate contract management procedure and/or contractual terms</p> <p>Consequence - Not realising maximum value for money for the Council or savings from a corporate level of control, risk to delivery of key Council priorities agreed by members in terms of community wealth building, inclusive economy, social value, fairness etc. Significant contractor failure/contractors failing to deliver within the agreed parameters (Quality, cost and schedule)</p> <p>Risk Update -</p> <p>We continue to implement the progressive procurement strategy 2020/27, with delivery mainly on track. There have been some delays in the delivery of the new contract register system but that is now in progress with training delivered to Supply Assurance Managers on how to use the system. The new contract register will improve corporate oversight of by bringing all Council contracts in one place. First phase is being delivered, which includes input of data, complete user testing and staff training. The new Procurement Bill is expected to reach final stage in early 2024 and there is now more clarity on what the new legal requirements will be and how the Council can prepare for compliance.</p> <p>The national economic environment continues to be challenging for with inflation and increasing costs and the Council continues to monitor suppliers' viability and ability to deliver within the agreed parameters.</p>	<p>Current Score: L:3 I:4</p> <p>Target Score: L:2 I:4</p> <p>Gap to target: L:1 I:0</p>	<ol style="list-style-type: none"> 1. Progressive Procurement Steering Group monitors delivery of the strategic implementation plan on a quarterly basis 2. Keeping guidance under constant review and improvement. 3. Commissioning and Procurement Board for overarching direction and Supply Chain Practitioners Group for knowledge sharing 4. Reviewing the operating model regularly with a push for greater control of contract management through a central category management model. 5. Staff training on procurement and contract management 6. Conducting drop-in sessions – social value in contract management 			
<p>Action</p>	<p>Expected impact</p>	<p>Resources required</p>	<p>Owner</p>	<p>Due Date</p>	<p>Status</p>
<p>Delivering the proposed design of new operating model for commissioning and procurement</p>	<p>Reduce likelihood and impact</p>	<p>Staff</p>	<p>S. Biggs</p>	<p>Summer 2023</p>	<p>In Progress</p>
<p>Continue to deliver the implementation plan for the progressive procurement strategy</p>	<p>Reduce Likelihood</p>	<p>Staff</p>	<p>S. Biggs</p>	<p>Ongoing</p>	<p>In Progress</p>
<p>Reviewing category management and working practice to assess quality of end-to-end processes from start to end of a contract and benefits of more a centralised approach.</p>	<p>Reduce Likelihood</p>	<p>Staff</p>	<p>S. Biggs</p>	<p>Ongoing</p>	<p>In progress</p>

Risk Information Risk Title – 13. Health and Social Care Integration	Risk Scores	Existing Controls			
<p>Risk - Insufficient capacity, resource and integration within the local health and care system to meet resident’s needs.</p> <p>Cause - National and local funding constraints</p> <p>Financial pressures on the health system impact on partnership arrangements with the Council and Health. As the Integrated Care System starts to develop and mature across the 5 borough footprint the role of the Local Authority to shape delivery for Islington residents is compromised.</p> <p>Consequence - Poor health and care outcomes for residents</p> <p>Risk Update -</p> <p>In recognition that local government place is where real changes happen a Local Integrated Care Partnership Board and Children’s Partnership Board has been established with Health and Providers from across the system to agree and set local priorities. However, ensuring appropriate funding is maintained to ensure delegated functions at place level can effectively be delivered continues to be challenging as the Integrated Care Systems financial challenges are still to be addressed, and following government announcements at the beginning of April 2023 that additional funding promised to Adult Social Care has been significantly reduced.</p>	<p>Current Score: L:3 I:4</p> <p>Target Score: L:2 I:2</p> <p>Gap to target: L:1 I:2</p>	<ol style="list-style-type: none"> 1. Health & Wellbeing Board, via the Leader of the Council is required to sign off our annual BCF plans with the NHS 2. Quarterly Section 75 meetings at Service Director level provide joint governance oversight of our pooled budgets 3. Commissioners will work with colleagues in Health as we review Section 75 arrangements and report any plans to the Health & Wellbeing Board. 4. Annual Section 75 reports to the Health & Wellbeing Board provide strategic governance over our pooled budgets 5. The Fairer Together Partnership, and its sub-boards will provide a clear and more effective governance framework for integration locally including more shared and local decision making around our local resource. The Fairer Together Borough Board, and its sub-boards is proving to be an effective forum for establishing vision, working principles and a plan of action across the Islington footprint. 			
Action	Expected impact	Resources required	Owner	Due Date	Status
<p>The Local Integrated Care Board, Children’s Partnership Board, Fairer Together Board and H&WB will continue to work together to strengthen Health & Social Care cross system working and on-going integration. Together we will set out our plans and proposals clearly from a place perspective, using evidence-based practice and population health data for Islington. We will work closely with the Integrated Care Board as they develop their plans for the future.</p>	<p>Reduce overall risk score</p>	<p>Capacity to effectively coordinate agreed ICS arrangements</p>	<p>J. Everson</p>	<p>Ongoing</p>	<p>In progress</p>

Risk Information Risk Title – 14. Serious Health and Safety Incident (Occupational)	Risk Scores	Existing Controls			
<p>Risk - Serious Health and Safety Incident Cause - Non-compliance with policies or procedures Consequence - Life-changing injury, fatality, compromising the health, safety and wellbeing of workforce, service users or public, potential enforcement action. Risk Update - Verbal abuse and physical violence towards council staff and contractors have increased over the last year. There is a particularly marked increase in housing and environment services. The H&S team has analysed incident data to understand the nature of incidents and identifying any patterns and pressure points. In response, all staff will receive refresher training on relevant H&S policies, e.g. lone working, and new training on conflict de-escalation is being developed. The H&S team is working closely with senior officers to drive awareness of this emerging issue across all services. The team is also reviewing how contractors are managed. Work-related stress continues to be a significant cause for staff sick absence and the team is working with HR colleagues to review the use and effectiveness of existing tools targeted at work-related stress. All types of health and safety incidents continue to be reviewed for any emerging patterns in the type of incidents and level of incidents by service. Targeted training is provided as needed. Due to the concerning trend in work-related violence incidents, this likelihood of a serious incident is assessed as increased since 2022. The impact score has been adjusted to reflect the potential consequence of a serious incident. The team will review the British Safety Council gap analysis completed in May 2019 to inform a revised audit plan and implement recommendations that remain relevant. Current review of Occupational Health and Safety leadership and governance to ensure a fit for purpose service and resources.</p>	<p>Current Score: L:3 (+1) I:4 (-1) Target Score: L:1 I:4 Gap to target: L:2 I:1</p>	<ol style="list-style-type: none"> 1. Regular reviews of Corporate Health and Safety policy and other Health and Safety policies. 2. Auditing plan to monitor compliance with H&S policies. 3. Health and Safety training included in corporate induction for new starters. Role specific training provided by services with support from Corporate Health and Safety Team. 4. Annual health and safety performance report to CMB. 5. Schools which have a service level agreement with H&S Team are supported by corporate health and safety and regularly audited. 6. Ongoing joint work with HR to support managers and services (place, physical and mental wellbeing). 			
Action	Expected impact	Resources required	Owner	Due Date	Status
Roll out H&S training programme to address occupational violence, including new module on conflict de-escalation.	Reduce Likelihood	Staff	S. Biggs	Dec 2024	In progress
Implement revised 3-year (2023-26) H&S audit plan with annual reviews.	Reduce Likelihood	Staff	S. Biggs	May 2024 (first review)	At planning stage

Risk Information			Risk Scores		Existing Controls	
Risk Title – 15. Failure to effectively respond and recover from critical incident						
<p>Risk - Failure to effectively respond and/or recover at a corporate or service level from critical/major incidents as a council. There is a risk we are not able to recover critical internal processes or respond effectively to a major incident following a disruptive event (internally/externally) within a suitable timeframe.</p> <p>Cause - Inadequate emergency response/contingency plans business continuity (BC) planning, disaster recovery and organisational preparedness and resilience.</p> <p>Consequence - Damage to reputation, resident safety, increased cost for response due poor planning, unacceptable response time.</p> <p>Risk Update - The Emergency Planning team have continued to respond to a number of incidents, including large incidents within the community; this included the nationwide fuel disruption, several large utility failures within the community requiring large scale evacuations. The team also planned and oversaw Operation London Bridge following the death of HM the Queen, the Proclamation of King Charles III and local events. The Emergency Planning wrote and delivered several exercises, including one for the Borough Resilience Forum. The Emergency Planning team are reviewing contingency plans as part of the regular review cycle and planning exercises as well as working on bespoke plans. The review of contingency plans is to include changing process to enhance organisational preparedness. The Protect Duty is yet to be fully published and so the full impact on local authorities is not fully known and the business continuity changes corporately are underway but large scale; both factors have contributed to the heightened overall risk.</p>			<p>Current Score: L:3 (+1) I:4</p> <p>Target Score: L:2 I:3</p> <p>Gap to target: L:1 I:1</p>		<ol style="list-style-type: none"> 1. Corporate Business Continuity plan and policy are in place. 2. Business continuity is being reviewed to enhance our approach to resilience and improve consistency across our services. 3. Introduction of an Islington Resilience Board to provide 'resilience champions' in each directorate to enhance organisational resilience. 4. Undertake lessons learned after any incidents. 5. Introduce standardised roles as part of the wider crisis response. 6. Maintain increased capacity of LALO's to support function. 7. Emergency generator at 222 office – Disaster recovery/Business Continuity. 	
Action	Expected impact	Resources required	Owner	Due Date	Status	
Full adoption of standardised roles across the organisation	Reduce impact	Staff	J. Young	Dec 2023	In progress	
Review of BC, Crisis Response Plans and technology processes	Reduce impact	Staff / Equipment	J. Young	Nov 2023	In progress	
Develop community resilience	Reduce impact and likelihood	Staff, Partners	J. Young	Dec 2023	In Progress	

Risk Information Risk Title – 16. Serious Health and Safety Incident in Housing	Risk Scores	Existing Controls				
<p>Risk - Serious Health and Safety incident in the Council's housing stock</p> <p>Cause - Non-compliance with statutory duties /regulations</p> <p>Consequence - Multiple fatalities, legal/regulatory action</p> <p>Risk Update -</p> <p>The service has conducted a self-assessment of how it deals with cases of damp and mould and is delivering an action plan to improve case handling. The team is also engaging in an investigation by the Housing Ombudsman on damp and mould repairs which is moving forward and is expected to report in June 2023. The demand from residents on damp and mould inspections has increased significantly over the last year from an average of around 200 to 800 per month. The team has brought in additional resources to meet demand and also reviewed the repair process to ensure visible damp and mould are addressed in a timely way.</p> <p>The Council is continuing to deliver its action plan to ensure compliance with the new requirements under the Fire Safety Act and Building Safety Act. Compliance programme is broken down in stages, with full compliance required by April 2024.</p>	<p>Current Score: L:2 I:5</p> <p>Target Score: L:1 I:5</p> <p>Gap to target: L:1 I:0</p>	<ol style="list-style-type: none"> 1. Homes & Estates Safety Board provide challenge. 2. Ongoing delivery of Fire Safety Action Plan 3. Ongoing Fire Risk Assessment programme, with annual cycle for tall buildings with 'tolerable' rating (rather than every 3 years as per regulations – commitment given post-Grenfell). 4. Fire Risk Assessments for all 87 tall blocks have been completed and published online for transparency. 5. Liaison with the Department for Levelling up, Housing and Communities and London Councils on emerging resident safety issues. 6. Housing Directors Fire Safety Sub-Group – monthly meeting to review actions, include senior staff from the London Fire Brigade (LFB) and Department for Levelling Up, Housing and Communities 7. Cyclical testing for electrical, lightning, legionella and construction risks remains on track. 8. Responsive testing service for asbestos containing materials (ACMs) in place. 9. New team structure being put in place in 2023/24 alongside additional resources and systems to ensure a joined-up service that meets the needs of new regulations. 10. Damp and Mould Task Force in place 				
Action	Expected impact	Resources required	Owner	Due Date	Status	
Continue liaison with Department for Levelling up, Housing and Communities and London Fire Brigade	Reduce Likelihood	Staff	J. Young	Ongoing	In progress	
Project to roll out inter-linked alarms in street properties	Reduce Likelihood	Staff	J. Young	June 2024	In progress	
Deliver programme of work to ensure compliance with new fire and building safety regulations	Reduce Likelihood	Staff/IT	J. Young	April 2024	In progress	
Embedding damp and mould strategy	Reduce Likelihood	Staff	J. Young	June 2023	In progress	

Risk Information		Risk Scores	Existing Controls			
Risk Title – 17. Safeguarding Children						
<p>Risk Safeguarding practice and provision for children and young people are ineffective to current and new familial and extra familial risks</p> <p>Cause Non-compliance with procedures, safeguarding practice and provision for children and young people are ineffective to current and new risks, lack of suitable trained and recruited staff, increase in demand</p> <p>Consequence Significant harm to a child(ren), death of a child</p> <p>Risk Update: The complexity of need has increased overall, and the service has also seen an increase in demand in some areas. A particular challenge since end of 2021 has been the increasing needs of unaccompanied children. Pressures due to Covid-19 impact on health staff, Brexit and cost of living crisis is creating difficulties in the recruitment market for social workers and staff in residential care settings. The Council continues to work with stakeholders to address recruitment challenges. Despite these challenges, the Council has consistently maintained staffing levels where we are able to respond to safeguarding concerns and comply with procedures. The cost-of-living crisis is causing increased pressures on families which is manifesting in increasing cases of domestic violence, mental health and contextual safeguarding risks. New legislation on unregulated accommodation for children in care is coming into force in August and is likely to further heighten the lack of suitable placements for 16–17-year-olds.</p>		<p>Current Score: L:2 I:5</p> <p>Target Score: L:2 I:5</p> <p>Gap to target: L:0 I:0</p>	<ol style="list-style-type: none"> 1. Robust Quality Assurance and monitoring processes in place. 2. Training and development processes in place which give ongoing assurance regarding quality of work and adherence to legal framework 3. Workforce strategy in place. 4. Close liaison with family courts to ensure cases which can be heard progress to final hearing, so children are afforded permanency. 5. Placements sufficiency strategy (additional resources in our placement team and working regionally to devise solutions). 6. Increased mental health and clinical support in care leaving service for UASC children (unaccompanied). Specialist UASC project officer. 			
Action	Expected impact	Resources required	Owner	Due Date	Status	
Working locally, regionally and nationally to address the challenges in social care staff recruitment.	Reduce likelihood and impact	Staff/Finance	J. Abbey	Ongoing	In Progress	
Working locally, regionally and nationally to alleviate the lack of care placements.	Reduce Likelihood	Staff	J. Abbey	Ongoing	In Progress	

Risk Information		Risk Scores	Existing Controls		
Risk Title – 18. Diversity and Inclusion					
<p>Risk - Failure to attract and retain the diverse talent we need at every level of the organisation to deliver our services</p> <p>Cause - Low turnover resulting in limited opportunities for progression Lack of engagement by some directorates in apprenticeship programmes. Limited use of social media and modern attraction mechanisms. Inexperienced and non-diverse panel members.</p> <p>Consequence - We will be unable to realise the benefits of a diverse and inclusive workforce in shaping and delivering our services.</p> <p>Risk Update - Workforce planning has been built into the new People Planning process and directorates now have a People Plan to support the recruitment and development of a diverse and inclusive workforce. The Challenging Inequality Programme has a formulated 'Islington as an Employer' workstream which includes a range of activities to improve equality, diversity and inclusion. An Internal first approach and diverse panels have been implemented. The recruitment process has been reviewed and an inclusive recruitment action plan developed. Work is underway with our Anchor Institutions network to share best practice on inclusive attraction and recruitment processes. An employer value proposition has been developed following engagement with staff and leaders which will support inclusive attraction strategies. A talent attraction strategy is also under development, identifying skills gaps, hard to recruit area and identifying supportive solutions. We have completed Cohort 1 of the Islington Management Diploma, Leadership programme and Management Modules for existing/aspiring managers and Cohort 2 is in progress. Cohort 3 will begin in 2023. We are working with recruitment agencies to ensure a diverse field of candidates where recruitment is required for senior leadership roles.</p>		<p>Current Score: L:3 I:3 (-1)</p> <p>Target Score: L:2 I:3</p> <p>Gap to target: L:1 I:0</p>	<ol style="list-style-type: none"> 1. The Challenging Inequality Programme workstream on 'Islington as an Employer' 2. The Public Sector Equality Duty (PSED) and Gender Pay Gap reports will incorporate an annual workforce equality plan. Both are reported annually to the Council's Audit Committee. 3. The Corporate Management Board quarterly HR reports which include information in relation to equalities in order to monitor progress. 4. DMTs review staff data on a monthly basis in order there is greater focus on monitoring equalities within departments. 5. Internal first approach and diverse panels 6. People planning process 		
Action	Expected impact	Resources required	Owner	Due Date	Status
Implementation of the Islington as an Employer workstream	Reduce L and I by 1	Existing staff resource	D. Hodgkinson	Ongoing	On track
Roll out of Islington's employer brand and employee value proposition	Reduce L and I by 1	Existing staff resource	D. Hodgkinson	September 2023	On track
Implementation of the talent strategy	Reduce L and I by 1	Existing staff resource	D. Hodgkinson	Ongoing	In progress
Implementation of the inclusive recruitment plan	Reduce L and I by 1	Existing staff resource	D. Hodgkinson	Ongoing	In progress

Risk Information Risk Title – 19. Serious information breach or non-compliance with legislation	Risk Scores	Existing Controls			
<p>Risk - The Council does not keep sensitive and/or personally identifiable information secure</p> <p>Cause - Non-compliance with policy and procedures</p> <p>Consequence - Fine, Reputational Damage, risk to individuals, legal action</p> <p>Risk Update –</p> <p>The council has reported one data breach to the ICO since the last risk update. This was closed with no further action as the ICO were satisfied by the mitigating actions taken by the council and that the breach was a result of human error and that there was no evidence of wider systemic failures.</p> <p>There is further regulatory change around data protection on the horizon. Data Protection and Digital Information (No.2) Bill was laid before parliament on 8 March 2023 and is due for its second reading on 17 April 2023. The proposed Bill contains a number of amendments to existing data protection legislation, however the impact of these on the council is expected to be low as we comply with current legislation.</p> <p>The council has a network of Information Asset Owners (IAOs) who are members of DSLT and accountable for ensuring that any risks to their information is well managed.</p> <p>The Information Governance team continue to meet with IAOs and their Information Leads on a quarterly basis with current focus being on entering assets and information risk to Coresteam (our compliance software).</p> <p>The council’s compliance with FOI and SAR responses continues to be low, to ensure this improves the Access to Information operating model is being reviewed and will move to a centralised approach.</p>	<p>Current Score: L:3 I:3 (-1)</p> <p>Target Score: L:3 I:3</p> <p>Gap to target: L:0 I:0</p>	<ol style="list-style-type: none"> 1. The Information Governance Board is in place to ensure that the SIRO receives assurance that the council is managing all information risks and complying with legislation. The Board also reviews any new risks to compliance – both DP and FOIA. 2. Timeliness of FOIs and SARs – this continues to be monitored – the operating model has been reviewed and a centralised approach with a corporate team will be created. 3. Monitoring of ICO guidance – ongoing 4. Embedding of the accountability principle – the council continues to ensure that this is embedded through meetings with IAOs and the use of Corestream to ensure there is clear oversight of all information assets and any associated risk and action. 5. A new IG strategy and associated action plan was agreed and is in place. 			
Action	Expected impact	Resources required	Owner	Due Date	Status
Create a centralised Access to Information Team to ensure that accountability for compliance is clear and that timeliness for responses improves.	Reduce overall risk score	Staff	D. Hodgkinson	July 2023	In progress
Implement open data strategy so that members of the public are able to access information more efficiently. The council will publish a schedule of when information will be published to support this.	Reduce overall risk score	Staff	D. Hodgkinson	April 2024	In progress

Risk Information Risk Title – 20. Domestic Violence Abuse	Risk Scores	Existing Controls				
<p>Risk - Failure to provide effective practice and provision for victims of domestic violence abuse.</p> <p>Cause - Accessibility to early intervention, economic slowdown/cost of living crisis resulting in increase in poverty, mental health issues and tensions within homes, inadequate capacity within the service</p> <p>Consequence - Serious harm to individuals and families</p> <p>Risk Update- The Violence Against Women and Girls (VAWG) Service Transformation has been completed and the new structures embedded.</p> <p>There has been a steady increase in referrals of cases at risk of serious violence, with incidents of severe violence also on the rise. There has been significant investment in this area over the last few years, and the Council has increased capacity from 4 to 54 investigators in addition to family support and resources. We continue to work with our partner organisations such as the police and probation services, both of which has been stretched over the last few years. The service is well resourced to meet demand.</p> <p>There are daily safeguarding meetings in place and every case is heard within three working days.</p> <p>Research collaboration with academic institutions continue and is resulting in more evidence-based interventions.</p>	<p>Current Score: L:3 I:3</p> <p>Target Score: L:2 I:3</p> <p>Gap to target: L:1 I:0</p>	<ol style="list-style-type: none"> Following additional £2 million council investment in 2020-23 to tackle VAWG, funding has now been mainstreamed into core funding. The investment has transformed the Council’s offer, and this has been bolstered by additional funding secured from Public Health, Mayor’s Office for Policing and Crime (MOPAC) and Violence Reduction Unit. This has been used to: <ul style="list-style-type: none"> Increase the number of Independent Domestic Violence and DA support roles in Islington -co-located in mental health, sexual health services, Bright Start and Children’s Services Contact Team, Targeted Youth Support and BAME services Extend the IRIS project (Identification and Referral to Improve Safety) providing DA training to GP practices, chemists etc. Sustain the DA counselling services Establish DA Daily Safeguarding meetings Raise awareness and improve response to VAWG through a comprehensive workforce development programme building on Keel project Provide phones to victims/survivors reporting DA and to survivors Establish a new Intimate Partner Violence service Secured funding for a full time PHD student with University of Essex until 2023 to evaluate the VAWG Transformation programme The police’s safeguarding teams in Islington are continuing to work closely with the council to ensure the safety of those experiencing DA and their children. A borough wide communications campaign is bringing VAWG services to the attention of residents & stakeholders. Housing services campaign to promote the support available to residents and all housing officers are trained to support tenants experiencing DA Dept. for Levelling Up, Housing and Communities Earned Autonomy funding for 2 Project Officers in the Workforce Development Team, 1.5 IDVAs in Brightstart and contributing to work with DA perpetrators and DA counselling. 				
Action	Expected impact	Resources required	Owner	Due Date	Status	
Working with partners to hold perpetrators to account	Reduce Likelihood	Staff	J. Abbey	Ongoing	In Progress	
Keel Legacy- Recommendations being implemented to embed a new approach to working with families experiencing DA.	Reduce Likelihood	Staff	J. Abbey	Ongoing	In progress	
Deliver VAWG Strategy Implementation Plan for Islington	Reduce Likelihood	Staff	J. Abbey	Ongoing	In progress	

Risk Information		Risk Scores	Existing Controls		
Risk Title – 21. Well Managed Workforce					
<p>Risk- Failure to successfully manage our workforce to deliver corporate priorities</p> <p>Cause - Lack of management experience/ability to manage performance effectively through a focus on outcomes.</p> <p>Consequence - Workforce may not be engaged, delivering its full potential, impacting service delivery.</p> <p>Risk Update: The new performance management framework (Check-Ins) takes effect from April 2023. The roll-out includes training for staff and managers to help them to get the most out of the check-in process while embedding a focus on delivery and performance development. The Care values framework is incorporated into the Check-in process. This will be supported by a new programme for managers called 'Leading with care', as part of the cultural change building block of the 2030 plan. The council's other leadership programmes (Emerging Leaders and Islington Management Diploma) continue with cohort 1 graduating in late 2022. The council's learning management system, MyLearning, has been in place for a year and now has over 200 e-learning and face to face learning options. This includes a specific section for managers to support the development of their skills. The Islington leadership network, led by the Chief Executive) has also been developed during the last year to support learning and discussion across Senior management network. The Futurework programme has set out the principles for our flexible, inclusive, hybrid working model.</p>		<p>Current Score: L:3 I:3</p> <p>Target Score: L:2 I:2</p> <p>Gap to target: L:1 I:1</p>	<ol style="list-style-type: none"> 1. Chief Executive management communications. 2. Performance management framework 3. Care behaviours' Framework and toolkit 4. Islington Management Diploma, Leadership programme and Management Modules for existing/aspiring managers 5. MyLearning, the council' learning management system 6. Islington Leadership network 7. Futurework programme 8. 2030 plan 		
Action	Expected impact	Resources required	Owner	Due Date	Status
Continued development of the learning management content to support management and workforce development	Reduce L and I by 1	Existing staff resource System costs (budgeted)	D. Hodgkinson	March 2024	On track
Launch of the new performance development framework and embedding across the council	Reduce L and I by 1	Existing staff resource	D. Hodgkinson	March 2024	On track
Cohort 3 of the Islington Management Diploma and Emerging Leaders programme	Reduce L and I by 1	Existing staff resource	D. Hodgkinson	October 2024	On track
'Leading with Care' management development programme	Reduce L and I by 1	Existing staff resource	D. Hodgkinson	December 2023	On track

Risk Information Risk Title – 22. Pupil Attainment Gap	Risk Scores	Existing Controls				
<p>Risk - Systemic failure to promote conditions (i.e. attendance) and quality provision and interventions which compound and increase pupil attainment gap for pupils</p> <p>Cause – levels of persistent absence, fixed term exclusions, the number of pupils opting to electively home educate, School fundings and viability remains a further challenge.</p> <p>Consequence - Pupils may not achieve their full academic potential (potential for a greater impact on vulnerable pupil's educational outcomes)</p> <p>Risk Update: Early Years (EYFS) and primary schools' assessments were undertaken for the first time in May 2022 since 2019. There were no adjustments to EYFS, and primary assessments and outcomes would not be published nationally. Outcomes would create a new baseline of assessments going forward. Secondary outcomes were undertaken with adjustments and results were published in January 2023.</p> <ul style="list-style-type: none"> • Overall outcomes lower in 2022 compared to 2019. • EYFS and Phonics outcomes were consistent with national but below Inner London in 2022. • Key Stage 1 outcomes were better than national and were above or in line with Inner London in 2022. • Key Stage 2 outcomes were better than national in all subjects in 2022 but behind Inner London • The Attainment 8 score was higher than national in 2022 and 4.1 points above the pre-pandemic score in 2019. • Pupils achieved a positive Progress 8 score, meaning they made more progress from KS2 than similar pupils nationally. • 97.3% of Islington Year 11 leavers moved into education, employment, or training (EET), with most remaining 'in learning'. 	<p>Current Score: L:2 I:4</p> <p>Target Score: L:2 I:2</p> <p>Gap to target: L:0 I:2</p>	<ol style="list-style-type: none"> 1. Islington Council approved the Islington Education Plan, SEND Strategy and School Organisation Plan in October 2022. All three plans are interwoven that focus on putting children and young people first so that schools are inclusive and viable. 2. Progress against the three plans are shared half termly with governing bodies, head teachers and the Education Board, Children's Scrutiny Committee and the Learning and Achievement senior management team. 3. Progress towards the 6 education priorities will focus on disproportionately of vulnerable groups (ethnicity, SEND, FSM, LAC etc) 4. Elective Home Education adviser has been appointed – increase to 3 days a week to address increased number of EHE pupils. All registered pupils have been RAG rated on vulnerability and will be the focus of all face to face home visits. 5. Secondary school leaders (ISSCL) meet every half term to review progress and achievements in secondary schools, particularly in relation to suspensions and attendance. This is strengthened by the creation of the ISSCL Deputy Head group. 6. From September 2023, statutory DfE guidance will be implemented to improve attendance, with a specific focus on schools and the local authority working in closer collaboration. All schools have been RAG rated to identify the appropriate level of support. 7. Schools are required to make an annual return on the use of school led tutoring funding. Schools that have not allocated this money accordingly will receive clawback from the DfE. 8. National assessments in EYFS, Phonics, KS1, KS2, GCSE and A Levels. There will be no adjustments to exams. All assessments will be published in 2023. 				
Action	Expected impact	Resources required	Owner	Due Date	Status	
<p>The Islington Education Plan identifies the following priorities:</p> <ul style="list-style-type: none"> • To improve attendance and reduce persistent absence. • To become an exclusion-free borough. • To eliminate all remaining disparities in educational achievement. • Increase take-up of Islington's Free Early Education Entitlement (FEEE) for two, three and four-year-olds. 	Reduce impact	Staff	J. Abbey	July 2023	In Progress	

Risk Information Risk Title – 23. School Viability and Place Planning	Risk Scores		Existing Controls		
<p>Risk - Failure to implement a coherent strategy for managing the demand of school places, that could impact the pattern of provision and schools’ viability.</p> <p>Cause - Significant reduction in pupil demand reflective of reduced birth and fertility rates within inner-London, impacted by Brexit and Covid, reduction in pupil yield from new housing. Real terms reduction in school level funding over the medium term</p> <p>Consequence - Schools become non-financially sustainable and unable to deliver the broad and balanced curriculum. Loss of confidence in the Council and quality of education impacted (all stakeholders)</p> <p>Risk Update: Demand for school places has fallen. In part this drop in demand has been driven by declining birth rates across London. Local evidence on births, health visiting and GP registrations (of children under 12 months), indicates that the recent reduction in births in Islington is likely to remain an ongoing trend. In 2019, the GLA identified problems of overestimation in the official ONS migration estimates, this is particularly acute in areas of London with high international flows and had led to inflated numbers of children in the projections that have now been revised.</p> <p>Individual school balances have been in decline since 2019 caused by the falling rolls, combined with increasing SEND and increasing cost pressures such as rising energy costs. An increasing number of Islington schools are projected to go into deficit.</p>	<p>Current Score: L:4 (+1) I:2</p> <p>Target Score: L:2 I:2</p> <p>Gap to target: L:2 I:0</p>		<ol style="list-style-type: none"> 1. Monitoring of school budgets 2. Quality assurance of school deficit recovery plans to eliminate deficits within 3 years 3. Appointment of School Resource Management Advisors from DfE 4. Supporting schools to create appropriate staffing structures 5. Financial Audits of schools – including sharing lessons learnt 6. Priority support providing focussed support to maintain provision 7. Delivery of a phased series of structural actions to implement the School organisation plan for 2022-2025. 8. The school organisation programme board continuing and increased internal governance 9. Updated roll projections completed with robust checking. 10. Admissions consultation completed (for admission in 23/24) 		
Action	Expected impact	Resources required	Owner	Due Date	Status
Implementation of the school organisation plan through a phased series of actions	Reduce Likelihood	Staff – PM support	J Abbey	Ongoing	In progress
Increased monitoring of school budgets	Reduce Likelihood	Staff	J Abbey	Ongoing	In progress

Risk Information Risk – 24. Change Programme Delivery	Risk Scores	Existing Controls			
<p>Risk – Corporate governance arrangements to manage transformational change programmes may not be fully embedded to enable successful delivery of strategic ambitions.</p> <p>Cause - Financial challenge, inadequate governance mechanisms, lack of project management capability</p> <p>Consequence - Change activity faces delay, declining quality and cost escalation, financial/other benefits are not met in full.</p> <p>Risk Update – The Transformation Team, including the project management office (PMO) has been moved under new leadership to support a more strategic alignment with the priorities set out in Islington Together 2030. A restructure of the Transformation Team will result in improved resources to support change delivery, including a dedicated role for financial monitoring of programme budgets. The new delivery model will be underpinned by a clear governance structure which will provide tighter overview of programme delivery.</p>	<p>Current Score: L:3 I:2 (-1)</p> <p>Target Score: L:2 I:2</p> <p>Gap to target: L:1 I:0</p>	<ol style="list-style-type: none"> 1. PMO toolkit available for staff to enable consistency in reporting and assurance. 2. Monthly Transformation Board meetings in place, chaired by Chief Executive to maintain a continuous focus on strategy, accountability and impact of key strategic programmes - bi-monthly rolling programme 3. Islington Together Board monitors delivery of major programmes and projects 			
Action	Expected impact	Resources required	Owner	Due Date	Status
Implement a new model for transformational change delivery	Reduce impact and likelihood	Staff	N. Murtuja	Dec 2023	In progress
Implement PowerBI dashboard reporting for monitoring delivery	Reduce likelihood	Staff	N. Murtuja	Autumn 2023	In progress

Risk Information Risk Title – 25. IT Transformation and Resilience	Risk Scores	Existing Controls			
<p>Risk - We do not deliver 1) IT projects which are required to enable effective business delivery and 2) provide strong systems resilience, to ensure residents have effective digital services.</p> <p>Cause - Insufficient planning/resourcing/funding to deliver the IT strategy. Lack of resources to build and monitor resilience, lack of disaster recovery planning</p> <p>Consequence - Operation disruption, additional cost, reputational damage</p> <p>Risk Update - Most of the critical resilience projects have now been completed with the majority of applications moved to cloud-hosted services. This includes most recently the Parking system which supports significant revenue. This risk is therefore assessed as reduced since the last report. The next significant systems to transition to cloud are Public Protection and Planning. Digital Services conducted a full power-down of the 222 Upper St data centre in August 2022 to allow electrical works to be completed. This confirmed that the Council can keep basic resident services and staff access operational in the event of an incident. The pressure of staff shortages remains as skilled IT resources continue to be in high demand - but there are signs of easing in some IT disciplines.</p>	<p>Current Score: L:3 I:2 (-1) Target Score: L:2 I:2 Gap to target: L:1 I:0</p>	<ol style="list-style-type: none"> The current controls include the ongoing use of the Information Technology Infrastructure Library (ITIL) service delivery framework to ensure operational services are effective in maintaining the current platforms on which we need to build. Digital Services has established shared same processes, tools and methodologies to create greater transparency and control of projects. As a strategy the council is moving to cloud and Software as a Service (SaaS). For example, the Office365 components run in cloud and will still operate if 222 fails entirely. Vacate the secondary datacentre (NBW) by Sept 2023 and the primary datacentre (222) by Dec 2024 (excluding non-site-specific equipment) in favour of cloud delivery. Business Continuity plans are in place. WAN Transformation & core/edge switch replacement has renovated the corporate network and reduced reliance on 222 as the network hub. Boundary services have been partially moved to cloud to support remote working. Investment in SAN replacement and move to cloud-based backup (off tape) has been completed Applications will be progressively upgraded to cloud where they are naturally architected to be more resilient and are not vulnerable to on-premises hardware failures. The cloud approach also spreads the attack surface for cyber activity reducing the impact should an attack be successful. 			
Action	Expected impact	Resources required	Owner	Due Date	Status
Continued delivery of IT strategy	Reduce overall score	IT/Staff/Finance	D. Hodgkinson	Ongoing	In Progress
Continued delivery of planned IDS projects	Reduce Likelihood	Staff/IT	D. Hodgkinson	Ongoing	In progress

Risk Information Risk Title – 26. Serious Fraudulent Activity	Risk Scores	Existing Controls			
<p>Risk- Serious fraud or corruption Cause – Lack of adequate governance arrangements including key controls and fraud awareness Consequence - Financial and reputational damage to the Council Risk Update: The Corporate Investigations team has increased its capacity. The team is continuing to manage the reactive case load and develop a programme of proactive anti-fraud reviews for 23/24. Controls conversations and control recommendations are being made, as apt, as a result of investigative activity. The work on the National Fraud Initiative is continuing. Joint working meetings have been held with other investigation teams including the Department for Work and Pensions (DWP) as applicable.</p>	<p>Current Score: L:3 I:2 Target Score: L:2 I:2 Gap to target: L:1 I:0</p>	<ol style="list-style-type: none"> 1. A whistleblowing policy and anti-fraud strategy and policy is in place. 2. Regular reporting to Audit Committee takes place including bi-annual whistleblowing monitoring reports and an annual fraud report. 3. Internal Audit and Corporate Investigations work closely to ensure that intelligence is shared to support the identification of fraud risks. 4. Internal Audit and Corporate Investigations also work jointly on some investigations to ensure that Internal Audit are able to make recommendations to enhance controls and prevent the recurrence of fraud. 5. Fraud risks feed into the annual Internal Audit Plan. Delivery of the Internal Audit Plan ensures that recommendations are made to address control weaknesses. 6. The Corporate Investigations team stay abreast of fraud alerts and fraud risks and share intelligence to service areas. 7. Corporate Investigations provide controls advice to service areas as applicable. 8. Corporate Investigations oversee the National Fraud Initiative (NFI) produced by the Cabinet Office, with service areas taking responsibility for their data matches (e.g. Housing, Parking). 			
Action	Expected impact	Resources required	Owner	Due Date	Status
Continue to engage in the National Fraud Initiative	Reduce likelihood	Staff	D. Hodgkinson	October 2024	Ongoing
Continue to develop an anti-fraud culture across the council through fraud awareness training and proactive anti-fraud reviews	Reduce likelihood	Staff	D. Hodgkinson	March 2024	Ongoing

Risk Information Risk Title – 27. Non-Recent Child Abuse	Risk Scores	Existing Controls			
<p>Risk - Failure to adequately plan and deliver the Support Payment Scheme and resilience/recovery support for survivors could affect delivery of services or have a significant financial impact</p> <p>Cause - Practical support offer does not meet the needs of survivors. Failure to accurately plan, quantify, administer and monitor the support payment scheme.</p> <p>Consequence - Decline in the health and wellbeing of survivors. Expenditure exceeds budget for the support payment scheme. Reputational and political damage</p> <p>Risk Update: The Support Payment Scheme was launched in May 2022. Governance arrangements have been put in place with a project board monitoring the delivery of the scheme and a strategic board reviewing overall performance. The risk of fraudulent claims was addressed proactively in the design phase of the scheme with strong mitigations in place. The scheme completes in 2024 and it is expected that there might be a rush of applications over the next 12 months. The scheme has been running well in its first year and the risk is assessed as reduced.</p>	<p>Current Score: L:1 (-1) I:5</p> <p>Target Score: L:1 I:5</p> <p>Gap to target: L:0 I:0</p>	<ol style="list-style-type: none"> 1. Existing practical support offer in place which encompasses trauma counselling, specialist advice, support and assistance for care, housing, appropriate welfare benefits, access to further education and suitable employment and support to access to care records. 2. Established relationship, and liaison, with the Islington Survivors Network and other groups who support survivors. 3. Programme governance in place to plan and monitor the full support offer survivors of non-recent child abuse including the approved Support Payment Scheme. 4. A full support offer has a practical support element, a financial element and recognition and acknowledgement by the council of the abuse suffered to help survivors to heal and to move forward from their experiences. 			
Action	Expected impact	Resources required	Owner	Due Date	Status
Practical support offer reviewed with survivors to ensure that it reflects emerging needs.	Reduce Likelihood	Staff	J. Everson	Autumn 2023	In Progress

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Risk Information Risk Title – 28. Increasing homelessness pressures	Risk Scores	Existing Controls			
<p>Risk - Increasing numbers of people applying as homeless lead to the increased use of expensive and inappropriate use of temporary accommodation which will place a financial burden on the Council's General Fund budgets.</p> <p>Cause - Increasing numbers of people applying as homeless due to the cost-of-living crisis, the war in Ukraine and the sale of private rented properties due to the wider global economic environment</p> <p>Consequence - Considerable financial pressure on the council's General Fund budget, hardship for Islington residents facing homelessness</p> <p>Risk Update: Nationally, there has been an increasing trend in the number presenting as homeless or at threat of homelessness. Between July and September 2022, 75,860 households in the UK were initially assessed as homeless or threatened with homelessness and owed a statutory homelessness duty, up 4.4% from July to September 2021. 34,130 households were assessed as being threatened with homelessness, up 5.8% from the same quarter the previous year. This includes 6,170 households threatened with homelessness due to service of a Section 21 notice to end an Assured Shorthold Tenancy – an increase of 34.4% from the same quarter the previous year. 12,330 households were accepted as owed a main homelessness duty, up 18.1% from July to September 2021. Islington is not immune to this trend and has seen an increase over the last year. In Islington, the use of temporary accommodation as of 31st March 2023 was 1,029 homeless households living in temporary accommodation compared to 848 homeless households as at 31st March 2022. A new Temporary Accommodation policy was approved by COMB in April 2023 and will be put to the Executive in May 2023 alongside a new Housing Allocations scheme for all permanent council and housing association accommodation. The service will also undergo a restructure in 2023/24 to ensure that homelessness prevention is at the heart of the service offer. Government funding for homelessness prevention is unknown beyond 2024/25, and there is a risk that the Council has been allocated less funds that it is entitled to due to issues around data collection in this area. The Council has seen a reduction in available lettings of Council and housing association accommodation which impacts on the ability to move people out of temporary accommodation.</p>	<p>Current Score: L:2 I:2</p> <p>Target Score: L:1 I:1</p> <p>Gap to target: L:1 I:1</p>	<ol style="list-style-type: none"> 1. Procedures in place to comply with the National Statutory Framework on housing duty and duty to relieve homelessness 2. New policy framework to be put in place for temporary accommodation and housing allocations scheme 3. Data collection and monitoring systems – new MRI application system provider being procured to strengthen this area 4. Islington Homelessness Partnership – a collaboration with service users, charities, community and faith organisations, the council and local businesses to deliver the vision in the Council's Homelessness Charter 5. Housing Aid Team supporting people to find temporary accommodation and creating Personal Housing Plans 6. Homelessness and Rough Sleeping Strategy 7. Outreach team specialised in supporting and preventing rough sleeping 			
Action	Expected impact	Resources required	Owner	Due Date	Status
Adoption of a new policy framework for temporary accommodation	Reduce overall score	Staff	J. Young	Sept 2023	Planned/in progress
Strengthen data collection and performance monitoring of people in temporary accommodation	Reduce overall score	Staff	J. Young	Summer 2023	Planned
Restructure of service to ensure focus on homelessness prevention	Reduce overall score	Staff	J. Young	March 2024	Planned

REPORT ENDS

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Finance

7 Newington Barrow Way

London N7 7EP

Report of: **Corporate Director of Resources**

Meeting of: **Audit Committee**

Date: **11 July 2023**

Ward(s): **All**

Subject: Anti-Fraud and Corruption – Strategy and Policy

1. Synopsis

- 1.1. In line with good practice, the Council seeks to continually review its policies and procedures to ensure that they remain fit for purpose. This report presents the Council's updated Anti-Fraud and Corruption Strategy and Policy.
- 1.2. The Council's existing strategy and policy have been updated in line with good practice and benchmarked against best practice in other Councils.

2. Recommendations

- 2.1. To agree the Anti-Fraud and Corruption Strategy and Policy at Appendix A and Appendix B.

3. Background

- 3.1. An effective anti-fraud and corruption strategy and policy are a key element of effective governance arrangements within the Council.

4. Implications

4.1. Financial Implications

- 4.1.1. The programme of work has been met from within the existing Internal Audit (Investigations) budget.

4.2. Legal Implications

- 4.2.1. There are no legal implications arising from this report. Legal advice and support will be provided, where necessary, in relation to individual investigations.

4.3. Environmental Implications and contribution to achieving a net zero carbon Islington by 2030

- 4.3.1. There are no environmental implications arising from the recommendations in this report.

4.4. Equalities Impact Assessment

- 4.4.1. The council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.
- 4.4.2. An Equalities Impact Assessment is not required in relation to this report, because the decision currently being sought does not have direct impact on residents.

5. Conclusion and reasons for recommendations

The report indicates that an Anti-Fraud and Corruption Strategy and Policy is in place and has been duly updated. The report is intended to support Audit Committee in obtaining assurance that the Council has a sound anti-fraud and corruption strategy and policy.

Appendices:

- Appendix A – Anti-Fraud and Corruption Strategy
- Appendix B – Anti-Fraud and Corruption Policy

Final report clearance:

Agreed by:

Corporate Director of Resources

Date: 20.07.2023

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Appendix A

Anti-Fraud and Corruption Strategy 2023

Local authorities continue to face a significant risk of fraud. Preventing, detecting and deterring fraud ensures that every penny is invested in delivering high quality services to our residents.

The fraud landscape continues to change considerably. The continued effort by fraudsters to innovate and sharpen their techniques, has meant that local authorities have needed to reconsider and develop new and innovative ways for preventing fraud and addressing new risks, including collaborative working to tackle cross-boundary fraud.

The increased risk of fraud is clear, and local authorities must ensure that we remain active in looking for and identifying fraud, whilst embedding a counter fraud culture at the heart of the organisation. To this end, and in line with other large organisations, fraud continues to be an inherent risk to the Council due to the size and nature of the services delivered.

The Council takes a well-developed approach and strategy to tackling fraud and corruption. At the core of this approach is a sound anti-fraud strategy and policy and well-resourced teams to tackle fraud. The Council has three lead investigation teams:

- Internal Audit Investigations (IAI);
- Housing Investigations;
- Parking Investigations.

There are also a small number of other teams across the Council with an investigative role. However, their roles are primarily concerned with the enforcement of legislation (e.g. trading standards, licensing).

While Housing Benefit fraud also falls under the remit of the Department for Work and Pensions' (DWP), the Council's investigation teams work collaboratively with the DWP to provide intelligence.

As a Council we are committed to the prevention and detection of fraud. We seek to engender a culture of zero tolerance towards fraud and corruption.

We believe that the overwhelming majority of the council's workers, customers, contractors, suppliers and others are honest and do not operate with intent to defraud the Council. However, we recognise that a small minority will attempt to do so. An effective anti-fraud strategy and policy ensures that we remain vigilant to the risk of fraud, seeking to protect every penny. Resources lost to fraud and corruption is resource that cannot be utilised to deliver services to our residents.

Our strategy aligns with CIPFA's counter fraud strategy as outlined in the FFCL strategy i.e. ["Fighting Fraud and Corruption Locally" \(FFCL\)](#). The FFCL outlines five pillars for an effective counter fraud framework:

- **Govern:** Having robust arrangements and executive support to ensure anti-fraud, bribery and corruption measures are embedded throughout the organisation;
- **Acknowledge:** Acknowledge and understand fraud risks and committing support and resource to tackling fraud in order to maintain a robust anti-fraud response;
- **Prevent:** Preventing and detecting more fraud by making better use of information and technology, enhancing fraud controls and processes and developing an effective anti-fraud culture;
- **Pursue:** Recovering losses by prioritising the use of civil sanctions, developing capability and capacity to investigate perpetrators of fraud and developing the Council's resilience to fraud, bribery and corruption;
- **Protect:** Protecting the Council and our residents from serious fraud and corruption. For a local authority, this will also cover protecting public funds, protecting its organisations from fraud and cybercrime and also protecting itself from future fraud.

The Council adheres to these pillars through the development and implementation of the anti-fraud and corruption policy.

Appendix B

Anti-Fraud and Corruption Policy 2023

1. Introduction

- 1.1 The Council is responsible for administering millions of pounds of public money in delivering services to residents and managing assets.
- 1.2 The Council is committed to ensuring that public funds and assets are used appropriately and effectively, and only those that are genuinely entitled to services receive them.
- 1.3 It is recognised that all organisations are at risk of fraud and corruption. The Council employs a zero tolerance approach to fraud and corruption.
- 1.4 The objective of the Anti-Fraud and Corruption Policy (AFCP) is to deliver the Council's Anti-fraud and Corruption strategy. The AFCP forms part of the governance arrangements of the Council and is authored by Internal Audit Investigations (IAI). Council workers are asked to read and understand the policy, to develop an understanding of how the anti-fraud strategy is delivered in practice, and the role that everyone plays in preventing and detecting fraud.

2. Corporate Framework

2.1 The Council has a range of policies and procedures to ensure sound governance. These are an important part of our governance framework and are the foundation of an effective counter fraud framework. These include but are not limited to the:

- Bribery Act Policy;
- Disciplinary Procedure;
- Council's Constitution;
- Declarations of Interest procedure;
- Dignity for All policy;
- Code of conduct for employees;
- Gifts and Hospitality policy;
- Recruitment and selection procedures;
- Information and data security procedures;

- Money laundering procedures;
- Procurement rules;
- Financial regulations;
- RIPA policies.

2.2 Managers must ensure that staff have access to these policies and procedures. Staff in this context relates to direct employees as well as other workers e.g. volunteers, agency, contract and casual staff.

2.3 If anyone fails to adhere to these policies, the Council may take formal action against them. This could include formal disciplinary action or legal action. Where any criminal activity/offence is identified, IAI will consider prosecution or referring the matter to the Police or other appropriate law enforcement agency.

3. Preventing and managing the risk of fraud and corruption

3.1 It is everyone's responsibility to reduce the risk of fraud and corruption. Employees and management alike, should seek to consider the risk of fraud in their daily business.

3.2 The risk of fraud should be considered when preparing risk assessments, business plans and service objectives. IAI can provide support to ensure that the risk of fraud is effectively considered and articulated.

4. Definition of Fraud

Fraud

4.1 Fraud encompasses an array of irregularities and illegal acts characterised by intentional deception with intent to make a gain or to cause a loss, or to expose another to a risk of loss. The Fraud Act 2006 defines three ways of committing fraud:

- By false representation.
- By failing to disclose information;
- By abuse of position.

4.2 In addition, the Fraud Act details offences relating to the possession of articles for use in fraud, making or supplying articles for use in fraud and obtaining services dishonestly, either personally or for another.

4.3 Theft is the taking without consent. In the Council this could be translated into any property belonging to the council such as cash, equipment, vehicles, and data.

Corruption

4.4 Corruption is the abuse of entrusted power for personal gain.

4.5 Corruption includes offering, giving, requesting or accepting a bribe or reward, which influences your actions or the actions of someone else. This can include but is not limited to cash or gifts.

Bribery

4.6 Workers need to be aware of their obligations under the Bribery Act 2020, which sets out offences of accepting and making bribes.

4.7 The Bribery Act covers the following offences:

- Active bribery: promising or giving a financial or other advantage;
- Passive bribery: agreeing to receive or accepting a financial or other advantage;
- Bribery of foreign public officials; and
- The failure of commercial organisations to prevent bribery by an associated person (corporate offence).

4.8 The Bribery Act also creates the corporate offence of “failing to prevent bribery on behalf of a commercial organisation” (corporate liability). To protect itself against the corporate offence, organisations are required to have adequate procedures in place to prevent bribery.

Money Laundering

4.9 Money laundering involves disguising financial assets so they can be used without detection of the illegal activity that produced them. Through money laundering, the criminal transforms the monetary proceeds derived from criminal activity into funds with an apparently legal source.

4.10 The Council recognises its responsibilities under the Money Laundering Regulations 2017 and the Proceeds of Crime Act 2002. The Council is responsible for identifying and reporting suspected money laundering. Services that receive money from an external person or body are potentially vulnerable to a money laundering operation. Vigilance is key and any suspicion concerning the appropriateness of a transaction should be reported and advice sought from the Money Laundering Reporting Officer (MLRO), who is the Council’s Monitoring Officer.

5. Types of Fraud

The common types of fraud that can typically affect a Council includes but is not limited to:

- **Blue badge** – Use of counterfeit / altered badges, use when disabled person is not in the vehicle, use of a deceased person’s blue badge, badges issued to institutions being misused by employees.
- **Business Rates** – Deliberate withholding of information or relevant facts to evade or reduce liability.
- **Council Tax and Council Tax Reduction Scheme** – False claims for support, discounts or exemptions to reduce liability
- **Cyber dependent crime and cyber enabled fraud** – Enables a range of fraud types resulting in diversion of funds, creation of false applications for services and payments.
- **Disabled facility grants** – Fraudulent applications for adaptations to homes.
- **Grants** – Work not carried out, funds diverted, ineligibility not declared.
- **Housing Benefit** – False claims regarding income, capital, rent liability or family makeup to increase entitlement to benefit.

- **Housing / Tenancy Fraud** – Providing false information to obtain social housing, sub-letting or parting with occupation, false succession applications and right to buy applications supported by money laundering.
- **Identity fraud** – False identity / fictitious persons applying for services / payments.
- **Internal fraud** – Diverting council monies to a personal account; accepting bribes; stealing cash; misallocating social housing for personal gain; working elsewhere while claiming to be off sick; false overtime claims; selling council property for personal gain.
- **Insurance fraud** – False claims including slips and trips and claims for damages.
- **Payment** – unauthorised payments, duplicate payments, payments to invalid suppliers for goods and services not received.
- **Payroll** – False employees, overtime claims, expenses.
- **Procurement** – Tendering issues, split contracts, bribery, double invoicing or failure to deliver.
- **Social Care** – direct payments, misuse of the service user’s personal budget.

6. Expected Behaviour

6.1 The Council is committed to the highest ethical standards and requires all persons and organisations that are associated with the council to be honest and fair in their dealings with us and our residents. We expect staff to comply with the Nolan seven principles of public life as (as outlined in Appendix 1 i.e. selflessness, integrity, objectivity, accountability, openness, honesty, and leadership).

6.2 Council workers have an important part to play in combating fraud and have a duty to report suspected fraud, irregularity, or corruption. The employee code of conduct states that where an employee becomes aware of activities which that employee believes to be illegal, improper, unethical or otherwise inconsistent with the code, the employee should report the matter.

6.3 Council workers should seek to protect the public purse at all times and act with the highest standards of integrity by:

- Doing nothing inside or outside of their working hours which could undermine public confidence in them as a Council employee;
- Not making any false allegations of wrongdoing;
- Developing an attitude of fierce protection of Council assets;
- Taking responsibility for proactively devising controls;
- Including fraud awareness as a regular item on team meeting agendas.

6.4 The Council will not tolerate fraud or corruption by suppliers, contractors, staff, agency workers, service users or any other parties with a business relationship with the council.

7. Fraud Response Plan

7.1 The Council is committed to the highest possible standards of openness and accountability. Therefore, the Council expects all employees, contractors (and their staff), partner agencies (including health authorities and voluntary sector groups), casual and agency workers, consultants, trainees, and self-employed people providing work for the council to raise any concerns they may have in any aspect of the council’s work.

7.2 The Council's fraud response plan (included at Appendix 2) details the action that will be taken where instances of fraud or corruption is suspected.

7.3 If fraud concerns reported to IAI relate to an elected member, IAI will inform the Council's Monitoring Officer.

8. What to do when fraud, bribery or corruption is suspected

8.1 Anyone who suspects fraud, bribery or corruption against the Council, must report this to their line manager without delay. Those who feel unable to report to their management should contact IAI.

8.2 Managers and staff are asked to notify suspected fraud or corruption to IAI immediately via their dedicated mailbox: internal.audit@islington.gov.uk. This is a restricted mailbox which can only be accessed by IAI.

8.3 Reporting cases in this manner to IAI protects the individuals and the Council's interest and compliance with legal requirements. It also ensures that:

- The fraud response plan is followed;
- Suspected cases of fraud and corruption are investigated properly and in accordance with legal requirements;
- There is a standard process for actioning suspected cases of fraud and corruption;
- Individuals' and the Council's interest are protected.

8.4 In order to comply with the Regulatory Investigatory Powers Act (RIPA) legislation that regulates surveillance activity, staff must not undertake covert surveillance, including audio or video recordings. The Council's Monitoring Officer can be contacted for further guidance in relation to RIPA.

Whistleblowing

8.5 The Council's Whistleblowing Officer is the Head of Internal Audit, Investigations and Risk Management. The Council has a separate whistleblowing policy which is kept under regular review.

9. Investigation of allegations

This section should be read in conjunction with the Fraud Response Plan at Appendix 2.

Initial action

9.1 Referrals received by IAI will be assessed and logged with a unique reference number. IAI will work with service management to decide on the type and course of the investigation. This may include referring cases to the police, other local authorities, or government departments.

9.2 If it is considered the allegation requires further investigation by IAI, an investigator will be assigned to the case. In some cases, the matter may be referred to another service (e.g HR) to attend to the matter or alternatively the matter may be referred to the service.

Investigation of allegations

9.3 IAI will secure any assets, documents, records and correspondence which may be relevant to the investigation. If there are computers or storage media which may contain information pertinent to the investigation, advice may be sought from the Information Governance (IG) team and/or Information and Digital Services before these are secured for analysis.

9.4 Where the investigating officer suspects that council email accounts may contain information pertinent to the investigation, then access to these will be obtained for analysis, subject to the necessary approval (including IG approval).

9.5 IAI will conduct a prompt and independent investigation and outcomes will be reported as outlined in the Fraud Response Plan at Appendix 2.

9.6 IAI will notify HR where the investigation involves a member of staff.

10. Investigative interviews

10.1 Fact finding interviews with managers and staff may be necessary to gain an understanding of internal controls, the services' policies and procedures, clarify any areas of uncertainty and to obtain information relevant to the investigation. Fact finding interviews may also need to be conducted to obtain the subjects' view on the allegations and the corresponding evidence obtained.

10.2 If the interview is conducted Under Caution, it will be conducted in accordance with the Police and Criminal Evidence Act 1984 (PACE), particularly Code C (detention, treatment and questioning of suspects) and Code E (audio recording of interviews with suspects). In cases of joint working with other law enforcement partners, the interview may also be conducted with another official present.

10.3 HR will be notified of with members of staff.

10.3 In some instances, it may be appropriate for an investigation to be conducted by an external investigator. This will be advised by IAI.

11. Referring cases to the Police

11.1 Where there are criminal allegations of fraud or corruption with reasonable evidence to support the allegations, consideration will be given to referring the matter to the Police. The decision to refer a matter to the Police will be taken by IAI.

11.2 If cases are referred to the Police, IAI will inform HR to consider if any further action is needed. However, IAI will continue to liaise with the Police to ensure that any criminal investigation is not prejudiced.

12. Post Investigation

12.1 In all cases a written record will be kept of investigation outlining the investigative activity and conclusion. Where the allegations are substantiated or recommendations are made, IAI will produce either a) an investigation report or b) a controls awareness note.

12.2 Managers and other staff may be asked to give evidence in any subsequent criminal or civil proceedings.

13. Recovering the Council's losses

13.1 IAI, in conjunction with the relevant service management, will ensure that all possible means to recover losses are pursued.

13.2 When a case has been referred to the Police and a criminal investigation takes place, where appropriate and in the absence of civil recovery action taken by the Council, request for an order for compensation may be made.

14. Control recommendations

14.1 Where control weaknesses are identified during an investigation, recommendations to enhance controls will be made at the conclusion of the investigation.

14.2 IAI will also liaise with Internal Audit to ensure that any fraud risks identified are included within Internal Audit risk assessments for future audit plans.

15. Working with Others

15.1 There is an expectation that the Council will share information internally and externally to support the prevention and detection of crime. Examples of these measures include:

- Internal data matching;

- Use of data matching tools, such as National Fraud Initiative (NFI) and Housing Benefit Matching Service (HBMS) provided by Department for Work and Pensions;
- Directed anti-fraud reviews.

15.2 We are committed to co-operating with other law enforcement agencies to prevent fraud and corruption. Wherever possible, we will be prepared to help and exchange information with other councils, law enforcement agencies and external organisations to deal with fraud.

15.3 The Department for Work and Pensions (DWP) conduct investigations into welfare benefits including Housing Benefit administered by the Council. We have a duty to share information under the provisions of Sections 122C (DWP to LA) and 122D (LA to DWP) of Social Security Administration Act.

National Fraud Initiative (NFI)

15.4 The Cabinet Office currently requires us to participate in the National Fraud Initiative, a biennial data matching exercise to assist in the prevention and detection of fraud. The Council are required to provide data sets for example Pensions, Creditors, Blue Badge and Housing waiting lists to the Cabinet Office as set out in their guidance. Further information is available at: www.gov.uk/guidance/national-fraud-initiative

15.5 Participation in the NFI is managed by IAI. IAI will work with service areas to ensure all datasets are uploaded. Individual service areas then have the responsibility to investigate matches.

National Anti-Fraud Network (NAFN)

15.6 The Council is a member of the National Anti-Fraud Network (NAFN). NAFN provides access to information and intelligence relating to fraud within the public sector to assist in the more effective investigation of fraud. IAI disseminate NAFN alerts to the appropriate service areas for further review and consideration. The Council will use the evidence gathering avenues that NAFN provide to support its counter-fraud and investigation activity.

16. Fraud Awareness

16.1 IAI will seek to promote a culture of fraud awareness via:

- Consideration of inclusion of the risk of fraud in the Council's principal risk report;
- Delivery of fraud awareness learning in areas identified as at a higher risk of fraud;
- Delivery of proactive anti-fraud reviews;
- Sharing of publications related to fraud risks and disseminating intelligence alerts.

17. Contact details

17.1 For further advice or to report a fraud, please contact:

- Internal Audit Investigations (all corporate fraud related matters and whistleblowing) – email: Internal.Audit@islington.gov.uk
- Housing Investigations – email: housing.fraud@islington.gov.uk
- Parking Investigations – email: parkingfraud@islington.gov.uk

Appendices

Appendix 1 – The Seven Principles of Public Life

Appendix 2 – Fraud Response Plan

Appendix 1

The Seven Principles of Public Life

These principles are a direct extract from the Nolan Committee report.

SELFLESSNESS

Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

INTEGRITY

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

OBJECTIVITY

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

ACCOUNTABILITY

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

OPENNESS

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

HONESTY

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

LEADERSHIP

Holders of public office should promote and support these principles by leadership and example.

Appendix 2

Fraud Response Plan

Notifying suspected fraud, irregularity, bribery and corruption

The Council relies on its staff to assist with the prevention and detection of fraud and corruption. It is often staff members who are in a position to identify potential fraud at an early stage.

The action taken when a suspected fraud is initially identified may be key to the success of any ensuing investigation. It is therefore important that staff actions are in line with the guidance provided in the AFCP.

The contact details for the Council's three core investigation teams are:

Internal Audit Investigations (IAI): Internal.Audit@islington.gov.uk

Housing Investigations: Housing.Fraud@islington.gov.uk

Parking Investigations: parkingfraud@islington.gov.uk

Whilst you can remain anonymous, it does help if your details are provided as concerns expressed anonymously can be difficult to investigate. For example, we may need to contact you to obtain further information or verify the information supplied.

- **Action by employees**

If you suspect fraud or corruption, you should:

1. Write down your concerns immediately. Make a note of all relevant details, such as what was said in phone or other conversations, the date, the time and the names of anyone involved;
2. In cases of suspected fraud or corruption, report the matter immediately to your line manager or IAI. Do not tell anyone else about your suspicions.
3. In cases of suspected money laundering, immediately inform the Council's designated Money Laundering Reporting Officer (MLRO) i.e. the Council's Monitoring Officer.
4. Co-operate and assist IAI (or other assigned investigators) in any investigation.

Do not conduct an investigation yourself without first consulting IAI, as this may prejudice an investigation or may result in investigative activity not being undertaken consistently.

Action by managers

If you suspect fraud or corruption, or your staff raise concerns with you, you should:

1. Listen to the concerns of your staff and treat every report you receive seriously and sensitively. Do not ridicule or minimise suspicions raised by staff.
2. Reassure staff that they will not suffer victimisation because they have told you of their

suspicions.

3. Get as much information as possible from the member of staff, including any notes and any evidence they have that may support the allegation. Do not interfere with any evidence and make sure it is kept in a safe place.
4. **Do not conduct an investigation yourself without first consulting IAI, as this may prejudice an investigation or may result in investigative activity not being undertaken consistently.**
5. Report the matter immediately to Internal Audit Investigations. Do not tell anyone else about your suspicions.
6. Co-operate and assist IAI (or other assigned investigators) in any investigation.

IAI investigation process

Suspected fraud or corruption will be investigated independently and professionally with the aim of protecting the interests of both the Council and the suspected individual(s). Where necessary IAI will work in co-operation with other organisations such as the Police, Government Departments and other local authorities.

Investigations into suspected fraud or corruption will be conducted fairly in accordance with the relevant statutory provisions and local protocols.

Should an interview be necessary, this will be conducted by qualified counter-fraud specialists. If there are two officers present, the second officer can be from IAI, from another investigative team or from an external organisation. The interview will be recorded to ensure that an accurate account of it is obtained and if it is conducted under caution, it will be in accordance with the Police and Criminal Evidence Act 1984 (PACE) guidelines. However, the final decision on whether to make a recording of the interview is at the discretion of the interviewing officer(s). The interviewee may request to have a copy of the recording after the interview.

Confidentiality

Details of any investigation are strictly confidential and will not be discussed with anyone other than the relevant management representatives. If the media becomes aware of an investigation and attempts to contact employees or Members, no disclosure of the alleged fraud and investigation can be given. All matters relating to statements to the media will be managed through the Council's Corporate Communications team.

Reporting Outcomes

Management will be informed of the outcome of the investigation which may include recommendations for consideration by the service. Reports compiled by IAI, whether draft or final, are strictly confidential and should not be forwarded to any other person than the named recipients on the report without IAI's permission.

Reports by IAI should not be relied upon solely for any disciplinary process considered by HR. There are two options:

- 1) The investigating officer can extract investigation findings in consultation with IAI and present them as part of their disciplinary pack, or
- 2) The investigating officer can call the IAI officer as a witness at the disciplinary hearing.

Report Ends

Law and Governance
7 Newington Barrow Way, N7 7EP

Report of: Corporate Director of Resources

Meeting of: Audit Committee – 10 July 2023

Part of the report is not for publication because it contains exempt information under Schedule 12A of the Local Government Act 1972, Paragraphs 1, 2, 3, 5 Schedule 12A of the Local Government Act 1972, namely: Information relating to an individual, information which is likely to reveal the identity of an individual, Information relating to the financial or business affairs of any particular person (including the authority holding that information) and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

THE APPENDIX TO THIS REPORT IS NOT FOR PUBLICATION

Subject: Employment Tribunal Claims and Settlements

1. Synopsis

- 1.1. This report provides information to Audit Committee on concluded Employment Tribunal Claims against the Council.

2. Recommendations

- 2.1. Audit Committee is asked to note the report.

3. Background

- 3.1. Employment Tribunals deal with claims brought against employers, by prospective, current and former members of staff.

4. Implications

4.1. Financial Implications

- 4.1.1. The internal legal cost of Employment Tribunals (save for disbursements e.g. counsel's fees which are met by local budgets) has been met from existing budgets held within Law and Government.
- 4.1.2. The financial implications resulting from decisions made at Employment Tribunals are met by local budgets.

4.2. Legal Implications

- 4.2.1 There are no legal implications arising from this report. Legal advice and support will be provided, where necessary, in relation to individual investigations.

4.3. Environmental Implications and contribution to achieving a net zero carbon Islington by 2030

- 4.3.1. There are no environmental implications arising from the recommendations in this report.

4.4. Equalities Impact Assessment

- 4.4.1. The council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.
- 4.4.2. An Equalities Impact Assessment is not required in relation to this report, because there is no direct impact on residents.

5. Conclusion and reasons for recommendations

- 5.1. To note the details of the report.

Appendices:

- Appendix A – Employment Tribunal and Settlements Reports.

Final report clearance:

Signed by:

Corporate Director of Resources

Date: 23 May 2023

Report Author: Rob Willis, Chief Corporate and Commercial Litigation Lawyer

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Resources
Town Hall, Upper Street
London N1 2UD

Report of: Director of Law and Governance and Monitoring Officer

Meeting of: Audit Committee

Date: 11 July 2023

Ward(s): None

Subject: Appointments to the Pensions Board

1. Synopsis

- 1.1 In accordance with its Terms of Reference, the Audit Committee is currently responsible for the appointment of members to the Pensions Board. However, following a review of the Constitution, a revised version is to be considered by the Council on 13 July 2023 requesting members to approve changes to the Terms of Reference of the Audit Committee, amongst other matters, and it is likely that appointments to the Pensions Board will no longer be the responsibility of the Audit Committee going forward.
- 1.2 The terms of office of both Valerie Easmon-Geroge, a scheme member representative, and Alan Begg, an independent member on the Pensions Board, recently expired.

Following consultation, both have expressed a wish to be re-appointed to the Board, in their former positions.

2. Recommendation

- 2.1 To appoint Valerie Easmon-George as a scheme member representative and Alan Begg as an independent member on the Pensions Board, each for a period of four years.

3. Background

- 3.1 The terms of office of both Valerie Easmon-George and Alan Begg as members of the Pensions Board have expired. In accordance with the current Terms of Reference, Board members may be re-appointed to the Board and, following consultation, both have expressed a wish to be re-appointed.

- 3.2 To ensure continuation of membership in equal numbers for the employer and member representatives and to achieve rolling reappointment to maintain knowledge and experience on the Board, it is recommended that each be appointed for a period of four years.

Implications

3.1. Financial Implications

None.

3.2. Legal Implications

None.

3.3. Environmental Implications and contribution to achieving a net zero carbon Islington by 2030

There are no environmental implications arising directly from this report.

3.4. Equalities Impact Assessment

The council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.

- 3.4.1. An Equalities Impact Assessment is not required in relation to this report, since the contents of this report relate to a purely administrative function and will not impact on residents.

4. Conclusion and reasons for recommendation

To ensure full membership of the Pensions Board to enable it to conduct its business.

Background papers: None

Final report clearance:

Authorised by:

Interim Director of Law and Governance and Monitoring Officer

Date: 22 June 2023

Report Author: Mary Green, Democratic Services Officer

Tel: 0207 527 3005

Email: mary.green@islington.gov.uk

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By virtue of paragraph(s) 1 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

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