Report of: Corporate Director of Resources

Meeting of:	Date:	Ward(s):
Audit Committee	11th March 2019	All

	Non-exempt

SUBJECT: Principal Risk Report 2019 Update

1.   Synopsis

1.1   This report presents the current principal risks facing Islington. It is an update to the Principal Risk Report considered by CMB and Audit Committee in January 2018.

1.2   The Principal Risk Report is an annual report, written in consultation with risk sponsors, risk leaders, Departmental Management Teams and the Corporate Management Board (CMB).

1.3   The background section at section 3 below highlights key events that have occurred since the last report and outlines key changes to the report. The appendix to the report presents the Principal Risk Report including the risk impact matrix, principal risk map, risk universe, executive summary and how our Corporate Plan links to our risks. The final section and main body of the report provides an update for each principal risk.

2.   Recommendations

2.1   Committee is asked to note the report.

3.   Background

3.1   Appendix 1 presents :
   *   An executive summary detailing principal risks and trends since the last update to Corporate Management Board (CMB) and Audit Committee in January 2018;

- A risk universe demonstrating the current risks by category;
- The Council's current risk map;
- How our risks link to our objectives, and maps the identified risks against our objectives; and
- The principal risk update, which provides an update for each risk, detailing recent developments and key mitigating actions underway.

3.2   We have reviewed and revised the risk scoring methodology since the last iteration of this report in January 2018. Previously risks were rated by the Risk Manager and their relative position indicated on the risk heatmap, however a definitive score was not assigned to each risk. We have revised this procedure to enhance the accuracy of the risk rating, recording, data collection and to encourage ownership of risk management at all levels. Risk leaders now own the rating of the risks using the risk rating matrix shown in section 1 of Appendix 1. Risk leaders have reviewed and rated their risks, these scores have then been reviewed by DMT's. The revised process allows those closest to the risks and organisational activities to provide the most accurate scoring as well as own the risk assessment process. A number of changes in scoring since the last iteration of the report have occurred, most notably:

- Cyber security – Increase in likelihood score to reflect external environment,
- Information governance breach – Adjusted the impact (increased) score to reflect our improving understanding of the external requirements,
- Response and resilience – Increased likelihood score to reflect the worsening external environment and the resulting increasing need to provide ever more robust responses and plans,
- Youth violence – Adjusted the impact score to reflect potential severity of the risk,
- Fraud – Increased likelihood to reflect the current financial environment in which the Council operates,
- IT delivery and transformation – Increased likelihood score following the withdrawal from the Shared Digital service.

Note: Scores which are adjusted are as a result of improved consistency in the risk assessment process do not necessarily represent a fundamental change in the risk itself.

3.3   A number of updates to the style of reporting have been made within the report, these include:

- Enhanced alignment with our Risk Management Framework: common use of risk management language throughout including defining the structure of risk statements,
- Risk Universe diagram: presents the spread of risk categories for the principal risks,
- Inclusion of control information: summary of current controls and potential future controls,
- Aligning our principal risks with the Corporate Plan (Building a fairer Islington; Our Commitment 2018-22): each risk is now aligned to the objectives detailed within this plan.

3.4   For each risk detailed in the report, there are a number of controls (mitigations) in place. This report provides a summary of these current controls but does not detail all of the controls already in place. Where appropriate potential future controls actions have been included.

3.5   **Additions**

- In recognition of the current uncertainty ahead of the United Kingdom's exit from European Union on March 29th 2019, and the potential impact of the exit on the Council and residents, we have included 'Brexit' as a new principal risk herein.

- In recognition of the external environment affecting the finances and operations of many of our contractors and the potential impact on service delivery for council services we have included 'Contract Management' as a new principal risk herein.

- In recognition of a number of external factors such as the declining housing market, contractor stability and supply chain resilience alongside a number of internal challenges around recruitment/retention and communications we have included 'New Homes Programme' as a new principal risk herein.

- In recognition of the number of change and transformation programmes scheduled in the medium term, and the financial and operational impacts of these programmes, we have included 'Delivery of the Change Programme' as a new principal risk herein.

3.6   **Deletions**

- Since our last update to Committee, have removed the principal risk related to the decline in services to schools and pupils. The current pupil numbers and funding position means the risk can be managed at departmental level and will continue to be monitored at departmental level.

- Since our last update to Committee, we have removed the principal risk related to Health and Social Care Integration. Indications are that relationships with NHS partners are stable, and pooled budgets and Section 75 are performing well, therefore this risk can be managed at departmental level and will continue to be monitored at department level.

4.   Implications

4.1   Financial implications:
The programme of work has been met from within the existing Internal Audit revenue budget. The financial implications of individual mitigating actions are met by local budgets.

4.2   Legal Implications:
There are no known legal implications arising from the recommendations in this report.

4.3   Environmental Implications
There are no environmental implications.

4.4   Resident Impact Assessment:

There are no direct equality implications arising from the recommendation in this report.

5.   Reason for recommendations

5.1   This report indicates the Council's activity to identify, monitor and mitigate principal risks.

Appendices

- **Appendix 1 – Principal Risk Report**

Signed by:

Service Director - Financial and Asset   Date: 22 February 2019
    Management (S151 officer)

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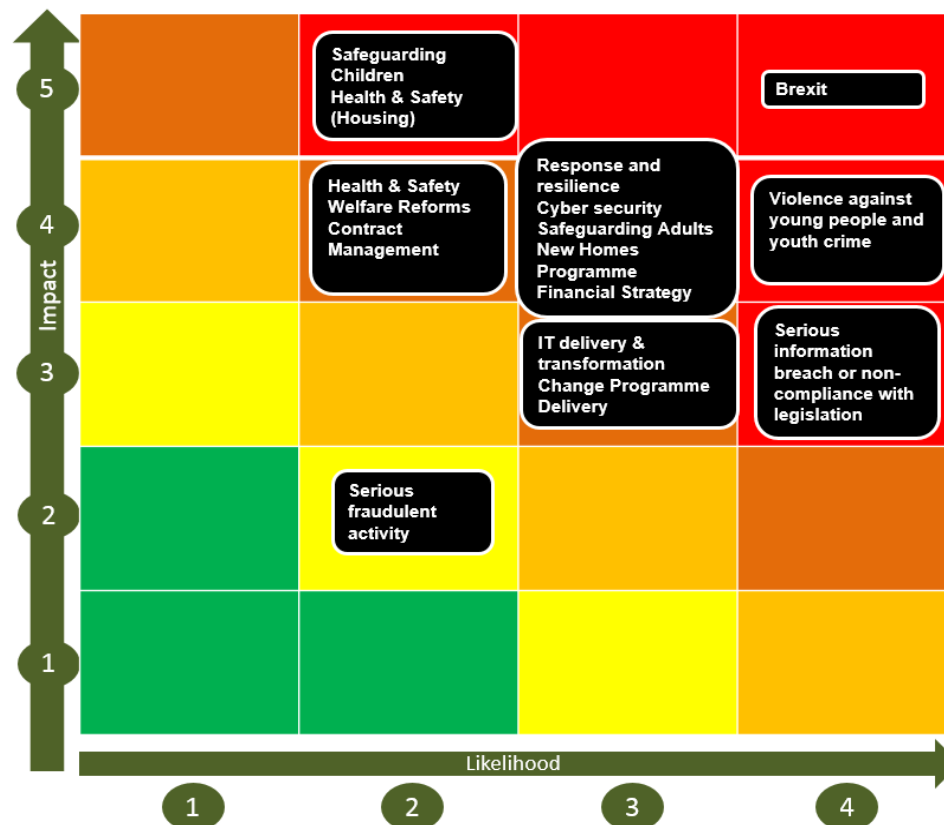| Financial Implications Author:	Mohammed Sajid
Email:	Mohammed.Sajid@islington.gov.uk
Legal Implications Author:	Peter Fehler
Email:	Peter.Fehler@islington.gov.uk

Appendix 1 – Principal Risk Report
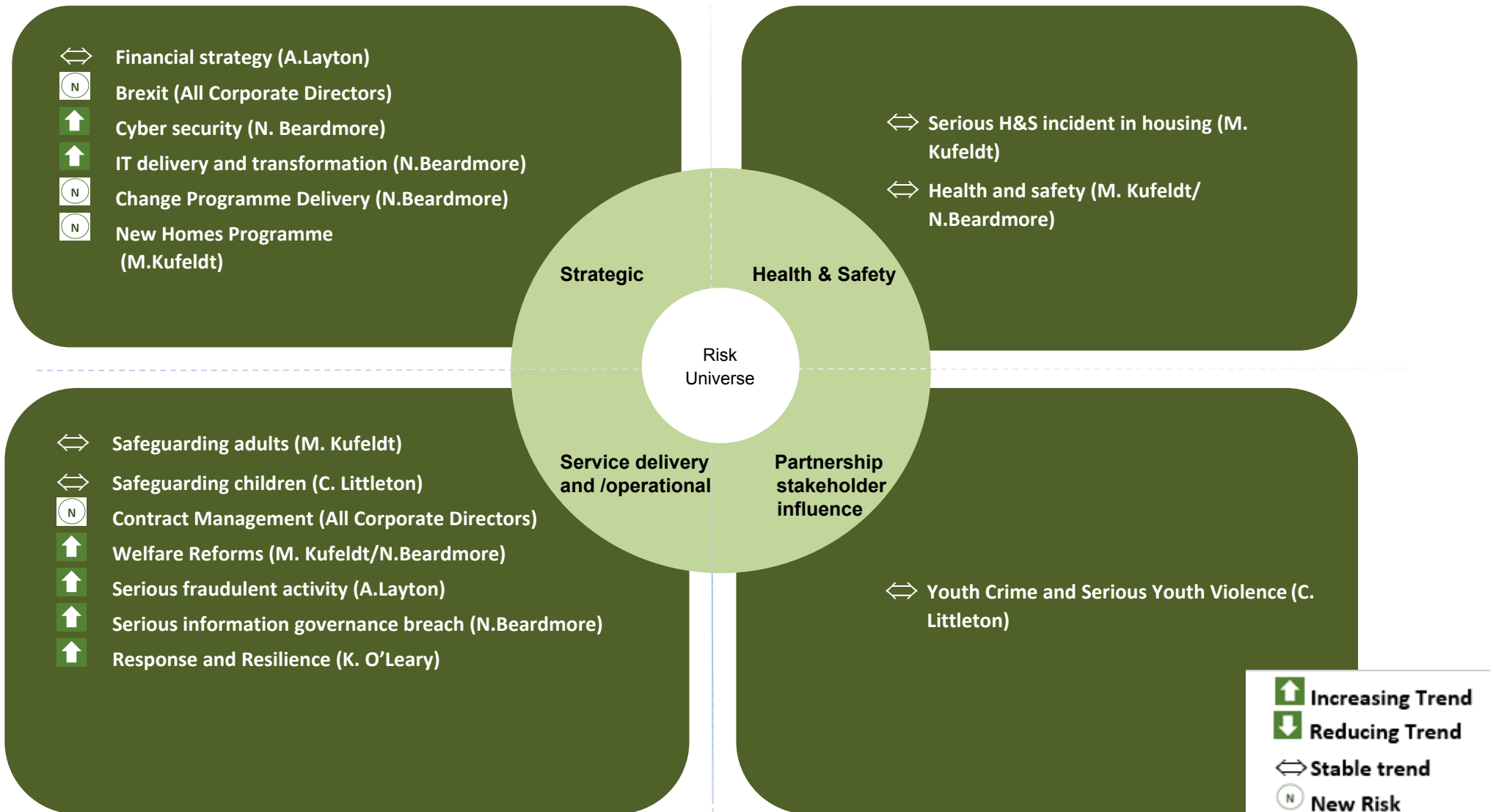
Executive summary of the principal risks

1. **Risk impact matrix and heatmap**

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.

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 oorder they appear in the box is not indiciative of severity.

2. Risk Universe (Including latest risk trend)

Strategic

⟷ Financial strategy (A.Layton)

Ⓝ Brexit (All Corporate Directors)

⬆ Cyber security (N. Beardmore)

⬆ IT delivery and transformation (N.Beardmore)

Ⓝ Change Programme Delivery (N.Beardmore)

Ⓝ New Homes Programme (M.Kufeldt)

Health & Safety

⟷ Serious H&S incident in housing (M. Kufeldt)

⟷ Health and safety (M. Kufeldt/ N.Beardmore)

Service delivery and /operational

⟷ Safeguarding adults (M. Kufeldt)

⟷ Safeguarding children (C. Littleton)

Ⓝ Contract Management (All Corporate Directors)

⬆ Welfare Reforms (M. Kufeldt/N.Beardmore)

⬆ Serious fraudulent activity (A.Layton)

⬆ Serious information governance breach (N.Beardmore)

⬆ Response and Resilience (K. O'Leary)

Partnership stakeholder influence

⟷ Youth Crime and Serious Youth Violence (C. Littleton)

Risk Universe

Legend:

⬆ Increasing Trend

⬇ Reducing Trend

⟷ Stable trend

Ⓝ New Risk

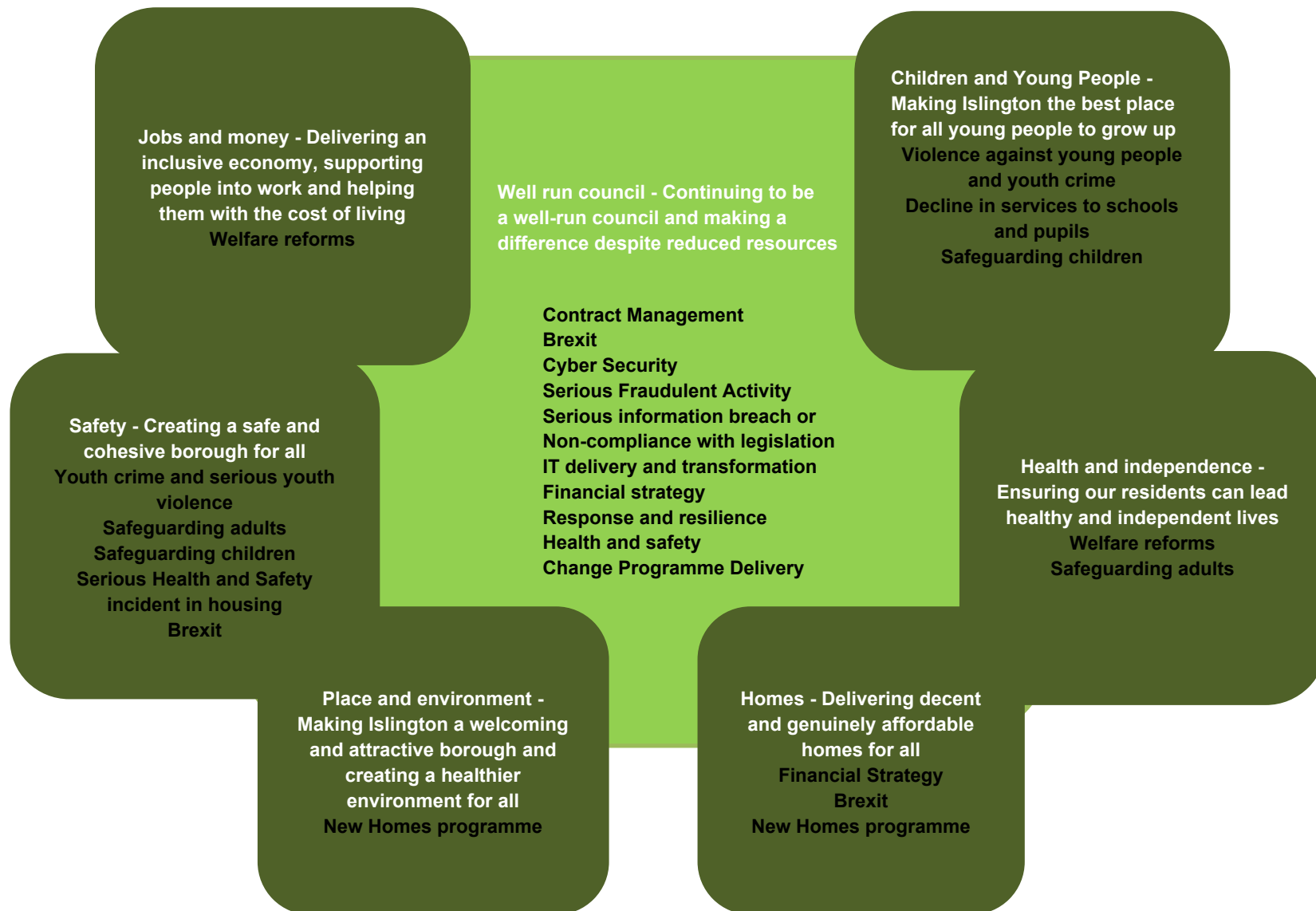Ⓝ New Risk   ⇑ Risk Increasing   ⟷ Risk Outlook Stable   ⇓ Risk Reducing

3. Executive summary of the principal risks

L=Likelihood Score I=Impact Score

Risk Score	L	I	Risk Title	CMB Risk Sponsor	Forward Trend Jan 18	Forward Trend Mar 19	Comment on change in trend
20	4	5	Brexit	All	-	New	The current uncertainty ahead of the United Kingdom's exit from European Union on March 29th 2019 and the potential impact of the exit on both the Council and residents remains unclear.
16	4	4	Youth crime and serious youth violence	C Littleton	↔	↔	Although crime overall is declining in Islington, violence and knife crime is increasing across London and risk levels can change rapidly.
12	3	4	Cyber security	N. Beardmore	↔	↑	Our protections have increased, however the evolving nature (frequency and varied severity) of threats makes it a challenge to mitigate. Cyber security remains a significant point of risk management focus.
12	4	3	Serious information breach or non-compliance with legislation	N. Beardmore	↑	↑	Residents are more educated regarding GDPR/DPA18 resulting in an increasing demand for advice. The application of GDPR/DPA18 has not yet been tested increasing uncertainty of potential fines.
12	3	4	Response and resilience	K O'Leary	↔	↑	External environmental triggers are worsening, our planning needs to be increasingly robust.
12	3	4	Safeguarding adults	M. Kufeldt	↓	↔	Stable outlook
12	3	4	New Homes Programme	M.Kufeldt	-	New	The housing re-build programme is reliant on both internal and external factors, recent declines in the housing market and contractor stability alongside internal challenges require more stringent project management.
12	3	4	Financial strategy	A. Layton	↑	↔	A 3 year savings plan has been formulated, the Council increased its balances and contingency to improve financial resilience.
10	2	5	Safeguarding children	C Littleton	↔	↔	Stable outlook
10	2	5	Serious H&S incident in housing	M. Kufeldt	New	↔	The recent improvements to housing stock have actively reduced risk to resident safety, however the external environment (compliance and regulation) is facing unknown change.
9	3	3	IT delivery and transformation	N. Beardmore	↔	↑	Trend is increasing in the short term following withdrawal from Shared Digital and the increasing age of systems. Longer term this will stabilise but remain dynamic.
9	3	3	Change Programme Delivery	N. Beardmore	-	NEW	Significant change is required in order to deliver the change programme, the Programme Management Office has been set-up to oversee and improve the management of these programmes.
8	2	4	Welfare reforms	M. Kufeldt/N. Beardmore	NEW	↑	Tenants will continue to naturally migrate meaning an increasing number will be on the new benefit. In addition it is planned around 2023 that all remaining legacy benefit claimants will be moved over in a managed migration.
8	2	4	Health and safety	M. Kufeldt/N. Beardmore	↔	↔	The Council's core activities and functions have not changed significantly and so the risk remains the same.
8	2	4	Contract Management	All	-	NEW	The external environment affecting the finances and operations of many of our contractors and the potential impact on service delivery for council services remains a challenge.

Risk Score	L	I	Risk Title	CMB Risk Sponsor	Forward Trend Jan 18	Forward Trend Mar 19	Comment on change in trend
4	2	2	Serious fraudulent activity	A. Layton	⟷	⬆	In the current financial climate, there is an increasing risk of fraud.

4. How our risks link to our objectives (Pillars)

Jobs and money - Delivering an inclusive economy, supporting people into work and helping them with the cost of living
Welfare reforms

Children and Young People - Making Islington the best place for all young people to grow up
Violence against young people and youth crime
Decline in services to schools and pupils
Safeguarding children

Well run council - Continuing to be a well-run council and making a difference despite reduced resources

Contract Management
Brexit
Cyber Security
Serious Fraudulent Activity
Serious information breach or Non-compliance with legislation
IT delivery and transformation
Financial strategy
Response and resilience
Health and safety
Change Programme Delivery

Safety - Creating a safe and cohesive borough for all
Youth crime and serious youth violence
Safeguarding adults
Safeguarding children
Serious Health and Safety incident in housing
Brexit

Health and independence - Ensuring our residents can lead healthy and independent lives
Welfare reforms
Safeguarding adults

Place and environment - Making Islington a welcoming and attractive borough and creating a healthier environment for all
New Homes programme

Homes - Delivering decent and genuinely affordable homes for all
Financial Strategy
Brexit
New Homes programme

5. Principal risk report – Risk information to note (Risks listed in descending order i.e. largest risk score to lowest risk score)

Risk Score	L	I	Risk	Activity Highlights	Summary of Controls	Actions and potential future controls
20	4	5	**Risk Title** Brexit **Risk** Disruption to local/council services and supply chains. **Cause** Challenges regarding cost and availability of labour, goods and services, decrease in funding from central government following withdrawal from the European Union (No-deal or terms of deal) **Consequence** Increased cost of services, reduced quality of services, contractor or supply chain failure, civil unrest and increased cost of living for residents. **Risk Trend** NEW	We have taken a number of steps to prepare for and understand the implications of Brexit on both the council and residents. The Brexit Resilience Group (BRG) has been formed, headed by a Corporate Director and comprising of key officers to support strategy and planning. The group has circulated information about Brexit to services to increase their awareness of the operational and strategic impact of our withdrawal from the EU. The BRG has submitted a data request (Brexit preparedness template) to each department to understand the potential impacts of Brexit. The BRG and Emergency planning team have started initial civil contingency planning regarding food and medicine supplies and potential impact on services and citizens. Services are currently being asked to update their business continuity plans, with resilience champions being identified in each department to work with Emergency Planning. Strategy and Change are working with Emergency planning to carry out an in depth review of business continuity plans and risks highlighted by departments to produce a comprehensive strategy for the council's response to Brexit and provide assurance to CMB.	The BRG is working towards increasing awareness and preparedness for the outcome of Brexit We attend the London Resilience Group, this enables us increased oversight and discussion with other Boroughs and emergency services, providing guidance on contingency planning. Brexit preparedness template sent to all services.	Review the output of the Brexit preparedness template data to ensure service risk mitigation is captured in 'business continuity plans' in conjunction with council wider strategy towards Brexit. **TARGET COMPLETION: end February 19 for completion of all BC plans (on track)** Monitor central government guidance. **TARGET COMPLETION: Ongoing, with weekly briefings** Monitor London Resilience Group **TARGET COMPLETION: Ongoing, with weekly briefings**

Risk Score	L	I	Risk	Activity Highlights	Summary of Controls	Actions and potential future controls
16	4	4	**Risk Title** Youth Crime and Serious Youth Violence **Cause** Early childhood trauma and disrupted attachment may lead to children being unable to self-regulate and therefore they are more likely to offend. Interventions with YP and families are not sufficiently tailored to have sufficient impact. The pull of gang affiliation and offending means that the trauma and the behaviours of young people are not addressed at an early enough stage to improve outcomes **Risk** There is an increase in crime and in the harm Serious Youth Violence causes. There is a perceived failure to respond adequately to/prevent crime involving young people, despite funding and well publicised plans. **Consequence** Increase in stabbings, fatal or otherwise. Media coverage contributes to fear of crime and negative attitudes towards young people compounding the issues they face. More young people within the criminal justice system **Risk Trend** ⬌	***Crime is falling in Islington Dec 2018- down 11% overall*** *(compared to 1.2% increase across London)* ***In the past year we have seen reductions in:*** • *Knife crime injuries victims under 25 down 6.6%* • *Serious Youth Violence down 3.9%* • *Gun offences down 11.8%* • *Snatch theft offences down 61%* • *Robbery offences down 9.8%* *But knife crime overall is up 12.5%* • MOPAC Knife crime plan 2017 • MOPAC developing Violence Reduction Unit for London 2019, Corporate Director attends • Pan London County Lines project • Delivery of Working Together for a Safer Islington plan work streams and local knife harm work • Council scrutiny on school exclusions, reporting in Q2 2019 with recommendations to reduce vulnerability • Disproportionality project in the Youth offending service/Targeted youth support • Transitions project to pick up vulnerable pupils between primary and secondary school transition • Keel project a new approach to working with families affected by domestic violence and abuse, focussed on repair as well as immediate safety • Reduction in first time entrants to Youth Justice System	Delivery of Working Together for a Safer Islington Plan 2017 – 20 Knife Harm plan and work 2018 - 2019 Investment in youth services, Integrated gangs team, youth violence prevention and Missing and Exploited team. Youth violence prevention work in schools Trauma informed approach is being rolled out Work at neighbourhood level to address hotspots, across council, voluntary sector and partner agencies	Youth Crime communications plan is being updated in 2019 **TARGET COMPLETION: End of March 2019** Review of the Working Together for a Safer Islington Plan taking place this year in preparation for a new plan in 2020. **TARGET COMPLETION: The current plan will be completed by Dec 2019 with writing a new one leading to the launch of the new plan in April 2020**

Risk Score	L	I	Risk	Activity Highlights	Summary of Controls	Actions and potential future controls
12	3	4	**Risk Title** Cyber security **Risk** Process Control Networks and/or Critical Information Assets may be compromised **Cause** Computer-based unauthorized access or malicious modification of code **Consequence** Denial of Service, data breach, reputational damage, disruption of service(s) **Risk Trend** ⬆	The council has made good progress on cyber protection with technology in place that has successfully repulsed a significant Denial of Service attack. Progress has been made to leverage central government initiatives on the implementation of secure email and Protected Domain Name Server (DNS). Implementation over the next 3 to 6 months. At the completion of this, the boundary will be appropriately protected for an organisation of our size and type. The protected DNS will be very effective against phishing and social engineering attempts. In addition, Cyber-threat training is being introduced for staff in key areas (such as payroll) and there will be a general awareness programme for all staff A Technical Design Authority has been included in the Business Case assessment process which ensures cyber security considerations are included in the early stages of an initiative and closer engagement with IT during purchase. Servers are up to date with patching although there is a need to further automate such activity. We will be looking to upgrade to Windows 10 as soon as practicable as Windows 7 becomes end of life.	Good practice boundary controls are in place and the additional controls will add effective protection against the constantly evolving threats. Continued backup of data provides an effective remediation for ransomware.	Develop Enterprise Resource Planning, this will introduce more automation. This is important around role based access and is effective in ensuring legacy access is removed as staff move/leave. **TARGET COMPLETION: April 2021 (subject to project planning)** Roll-out training. **TARGET COMPLETION: April 2021 and ongoing (subject to project planning)** Introduce (for approval) a set of CIO authorities which sets out the scope of products and services for which the CIO's approval must be obtain. This will be a significant help in ensuring no 'weak link' components provide new threat vectors for attacks. **TARGET COMPLETION: April 2019** Cyber Breach Exercise planned to test cyber resilience. **TARGET COMPLETION: Dec 2019**

Risk Score	L	I	Risk	Activity Highlights	Summary of Controls	Actions and potential future controls
12	4	3	**Risk Title** Serious information breach or non-compliance with legislation **Risk** The Council does not keep sensitive and/or personally identifiable information secure **Cause** Non-compliance with policy and procedures **Consequence** Fine, Reputational Damage **Risk Trend** ⬆	The General Data Protection Regulation and Data Protection Act 2018 came into force on 25 May 2018. In preparation for the enforcement deadline and as part of our ongoing work a number of activities have been undertaken since the last update including: - Data Protection Officer has been appointed - Creation of the Records of Processing Activities - Mapping the retention of information assets - Lawful basis of information assets identified and documented - Updated Privacy notices have been created and published on the council's website - Data Protection Impact Assessment templates and guidance have been reviewed and are in use - Public guidance on the new rights have been created and published - Policies and procedures updated - New contract clauses have been created - Existing contracts have been updated to include GDPR addendum. - Contract Due Diligence checklist created including a supply chain assessment. - New eLearning courses have been created and rolled out to all staff - Information Governance and Information Security Action plans in place (reviewed monthly) Information Governance and Information Security Strategy was agreed by CMB in January 2019, will now be working towards executing An Audit reviewed our preparedness for GDPR, the outcomes were considered in the creation of Action Plans. 1 Data breach has been reported to the Information Commissioners Office (ICO) a CD of an audio recording of an interview into food standards offences was lost in post – An internal investigation was completed and we are waiting a response from the ICO.	E-Learning training modules: GDPR released in August 2018 Data Handling released in September 2018 Metacompliance system delivers desktop compliance messages. Corporate Governance Group provides oversight and challenge Monthly meetings with Senior Information Risk Owner (SIRO) to provide oversight and challenge Information Governance and Information Security Action plans in place (reviewed monthly)	Retention and deletion of data on systems is being identified and implemented **TARGET COMPLETION: Ongoing; aiming for March 2020** New training provider being identified for Information asset Owner's **TARGET COMPLETION: End of Feb** Information Security and Cyber Security Awareness training being identified **TARGET COMPLETION: Sept 2019** Proposed mock ICO Audit to take place in 2021 to review effectiveness of strategy. **TARGET COMPLETION: 2021** Reviewing the roles and responsibilities of the Data Security Working Group and the GDPR Working Group. **TARGET COMPLETION: Mid-March 2019** Monitoring of ICO guidance and revision to guidance and templates **TARGET COMPLETION: As required**

Risk Score	L	I	Risk	Activity Highlights	Summary of Controls	Actions and potential future controls
12	3	4	**Risk Title** Response and resilience **Risk** 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 **Cause** Inadequate business continuity (BC) planning and disaster recovery **Consequence** Damage to reputation, resident safety, increased cost for response due poor planning, unacceptable response time. **Risk Trend** ⬆	Business Continuity Exercises relating to Housing and Cyber-attack postponed and to be rescheduled. Emergency generator at 222 Upper St remains installed, but not yet connected nor tested. Completed the review of Emergency Planning and team now fully staffed, resources need to kept under review as we work to comply with the London Resilience Forum standardised model. A complete refresh of the Business Continuity Plan and Business Impact Analysis (BIA) template has been undertaken. Each service has been requested to complete a new Business Continuity Plan Template including BIA. The revised template was sent in November to each service. All services will complete and review within the next 6 months, with controlled copies then held by the EPU. Undertaken several real-time BC responses including during the IT denial of service attack. The lessons learned after events have been used to inform resilience planning with IT and BC. The Islington Resilience Board has been set-up and held their first meeting, with lead Service Directors for each department. A programme of business continuity training is being developed.	Arrangements for business continuity have been reviewed and are being implemented. The Islington Resilience Board will meet to improve the BC culture and ensure plans are completed. Resources in the EPU have been increased and will be kept under review. Exercises are planned to test areas identify as highest risk. Undertake lessons learned review after any incidents.	Implement outstanding actions arising from the audit of business continuity including the need for critical services to have appropriate out of hours arrangements to respond to incidents **TARGET COMPLETION: June 2019** Connect the emergency generator and ensure it is fully functioning (Shared Digital Services /Public Realm/Facilities) **TARGET COMPLETION: September 2019** Complete 4 BCP exercises including testing of a Cyber Attack and serious incident affecting housing stock. **TARGET COMPLETION: December 2019**

Risk Score	L	I	Risk	Activity Highlights	Summary of Controls	Actions and potential future controls
12	3	4	**Risk Title** Safeguarding adults **Risk** Failure to fulfil our statutory obligation to identify or respond to significant preventable harm to adults at risk of abuse **Cause** Provider Failure, Non-Compliance with procedures, inadequate IT systems. **Consequence** Risk to Individual, Reputational. Financial. **Risk Trend** ⟷	An independent review of social work in the Mental Health Trust was conducted, actions included reviewing the Section 75 agreement to ensure the social agenda is correct. We have also set-up a Partnership Board, this has helped us to improve our joint working and strategic decision making. With regards to quality of care, we currently have 1 care home in a 'provider concern' process, this provider does have a sustainable improvement plan in place. CQC announced that one of our significant block providers of domiciliary care came into difficulties in November 2018, this event caused us to enact our contingency plans in conjunction with the Business Continuity team. We were able to source alternative care for our residents in a phased manner which resulted in minimal service disruption. In March 2018 another local authority alerted us to a serious provider concern where Islington had placed the majority of the residents. The concerns were so serious it was clear that residents should be moved out urgently. Our review team and brokerage team undertook rapid reviews of Islington residents, securing alternative appropriate placements. All residents were relocated speedily. There is now a Principal Social Worker in place, working with the Head of Safeguarding Adults and Safeguarding team to make safeguarding personal using a strength based approach and providing support for social worker through the provision of a number of forums. We are also introducing making safeguarding personal to ensure that the strengths based approach in echoed in our safeguarding adults work. We continue to keep a watching brief on amendments to the Deprivation of Liberty Safeguards, it is expected that the review will be finalised during 2019. We are also focusing on Modern Day Slavery and in partnership with colleagues in Community Safety are rolling out a specialised training package for staff supported by bespoke guidance to ensure that staff are able to respond appropriately to concerns relating to trafficking and slavery of vulnerable groups. In response to the rising number of safeguarding concerns and deaths involving rough sleepers and homeless people we are ensuring that wherever possible learning from serious cases is embedded in practice. We are also working closely with colleagues in Housing and Community Safety to ensure specific safeguarding concerns relating to individuals who are homeless receive a personalised offer of support in order to minimise risks of harm in the future.	Mental Health Social worker working at the front door' providing immediate response and improved oversight. Working with providers to help viability, and continuing to spread our services between providers. Continuous cycle of placement reviews – within 6 weeks of a new placement, annual review thereafter. Frequent case audits. Practitioner forums looking at quality of work and experience of officers, to obtain feedback and undertake training. Monthly Meeting with those involved in registered care settings including partners in health, CQC and Healthwatch to undertake pro-active provider monitoring. Early stage intervention and escalation. Quality Assurance Framework for Adult Safeguarding is in place. This includes a monthly case file audit and the establishment of a clear set of quality standards for safeguarding work (the safeguarding QA framework) Robust safeguarding adults and mental capacity act policies and procedures are in place and regularly reviewed to ensure they remain consistent with the pan-London Safeguarding Adults procedure and relevant ADASS guidance. Improving connections meetings, focussed support work for the council and our key partners. Constant contract monitoring in-place, commissioners are very well linked to national network. Modern Day Slavery training continues to roll out across the department and council. Ongoing engagement with the Home Office and the Human Trafficking Foundation will ensure Islington remain abreast of all current developments and concerns. There is a dedicated Safeguarding and housing meeting that takes place regularly to ensure the ongoing work agenda remains a priority. Housing and Community Safety are core members of the Safeguarding Adults Board. Islington Council have participated in a 4 borough Safeguarding Adults Review recently into the death of a homeless person and the learning will be disseminated appropriately across the department to reinforce good practice.	There is Longer term ambition to source an IT solution for Mental Health recording. The Mental Health Trust would like to have one recording system for C&I, Camden and Islington councils. Any shared system will need to be agreed by all organisations involved as there are potential risks to LBI in changing our LAS module for a more generic system that meets the reporting needs of all three organisations. On top of the preliminary investigations to assess the appetite and suitability of a shared system the development of any new system will need time to ensure time for testing and bug fixing. **TARGET COMPLETION: September 2020** There will be an Audit Safeguarding Adults and Mental Health undertaken by Internal Audit. **TARGET COMPLETION: By end 2019**

Risk Score	L	I	Risk	Activity Highlights	Summary of Controls	Actions and potential future controls
12	3	4	**Risk Title** New Homes Programme **Risk** Delay or Inability to deliver the New Build Programme, quality, time and cost. **Cause** Resourcing, contractor failure, delay in planning approval, poor resident engagement. **Consequence** Reputational damage, service delivery. Loss of opportunity for residents **Risk Trend** NEW	The target for the new build programme is to complete 550 genuinely affordable homes in this current four-year programme. The new build team provides an update report on performance against the 550 target to the New Homes Board (NHB); the reporting has been improved to give the NHB greater clarity and more detailed information. The programme is currently forecasting to complete 662 social rented homes by the end of the four-year programme; some contingency is built into the programme. In addition to the 550 units Islington was successful in obtaining grant funding from the GLA, this will allow us to 'flip' an additional 131 units which were originally intended for sale, but will now be built for social rent within the current four year financial plan. We have experienced delays to some schemes due to factors outside of our control. There has been some initial slippage in schedule and spend (circa £40m) at the start of the programme. This slippage is mainly due to the environment of operating in the feasibility/pre-commencement stage of individual projects. We conducted a workshop in 2018 to understand the issues with the scheme and to identify improvement actions to help move the programme forward. The removal of the HRA cap by government has provided additional freedom and flexibility providing scope to borrow. The Housing Strategy Group have reviewed the programme, this review focussed on finances, our communications approach and opportunities for building more homes. This group have produced an action plan. The action plan is reviewed at the programme board.	Employed a communications officer to improve resident engagement. Engaged a team of architects to review opportunities for building, reviewing different building techniques. Programme Board (NHB) Chaired by Cllr Ward, provide challenge and oversight. Reporting improved to provide better oversight (strategic information). Quality, schedule, cost. Meet bi-monthly. Programme structure includes contingency. Project Board, Operational focus review all schemes, meet bi-monthly	Funding resource for planning officers **TARGET COMPLETION: July 2019** W submitted a bid to the GLA in January 2019 through the Homebuilding Capacity fund to fund more Planning and Development Managers **TARGET COMPLETION: Announcements in Spring 2019** Reviewing how the team operates to identify improvements, one of the potential changes include appointing a Service Director for the New Build programme **TARGET COMPLETION: April 2019** Develop communications strategy Implement the remaining action plan recommendations. **TARGET COMPLETION: May 2018**

Risk Score	L	I	Risk	Activity Highlights	Summary of Controls	Actions and potential future controls
12	3	4	**Risk Title** Financial Strategy **Risk** The Council fails to balance the Council's budget over the medium term – including making cash savings. **Cause** Decision making (robust consideration) **Consequence** Immediate – Serious depletion of limited financial reserves reducing financial resilience Longer term – Reduced financial sustainability impacting service delivery **Risk Trend** ⟷	The closing position of 2017/18 budget resulted in a reduced overspend of £3.4m down from £9.7m in September following sustained management action across the Council. The 2018/19 budget fully funded the underlying children's demand and cost pressure from 2017-18. All service areas are reporting underspend or breakeven aside form Environment and Regeneration who currently report a slight overspend of £0.5m, this overspend has been brought down by management action taken during the year. We have this year increased our general balances by £2m, to £10m, increasing our financial resilience. Our new 2019/20 Budget report and Medium Term Financial Strategy (MTFS) was presented to the Executive in January with the Council due to approve the final budget on 28 February 2019. Our MTFS for 2019-22 is based on needing to close a revenue gap of c£50m in the next 3 years. We have undertaken an extensive exercise to re-examine every budget line and ensure we are prioritising spend on the right things. This exercise has enabled revenue savings proposals to be proposed for the next three years, these proposals will be managed through Programme Management Office (PMO). The PMO will monitor performance and provide the project management infrastructure for these proposals. The Government will conduct the Spending Review this summer, this review will determine the amount of available finance for local government. The Government is also undertaking the Fair Funding Review. The outcome will determine how funding will be allocated between each Local Authority. Until the outcome of these two events is known there is huge uncertainty over the Council's funding position from 2020/21. It was welcomed that the government announced in the autumn of 2018 the lifting of the Housing Revenue Account borrowing cap. This gives the Council more flexibility to fund the new build housing programme.	The Programme Delivery Board and Programme Management Office provide a programme management approach to monitoring key savings programmes and other financial programmes. The Corporate Management Board and the Executive closely monitor financial performance delivering robust financial monitoring on a monthly basis Society of London treasurers. London Council's and GLA lobbying regarding the outcomes of the Government reviews with Fair Funding consultation submissions due by 21 February 20.	We will respond to the government funding consultations. **TARGET COMPLETION: 21 February 2019** Embedding the PMO, this includes a training programme defined in the P3M training framework, which includes project and risk management training. **TARGET COMPLETION: September 2019**

Risk Score	L	I	Risk	Activity Highlights	Summary of Controls	Actions and potential future controls
10	2	5	**Risk Title** Safeguarding children **Risk** Ineffective protection of children and parents **Cause** Non-compliance with procedures **Consequence** Significant harm to a child(ren) **Risk Trend** ⟷	Actions from 2018/19 all completed There was an Ofsted ' Focussed visit' in April 2018, which focussed on vulnerable adolescents and which found services to be good and children at risk of Child Sexual Exploitation, gang exploitation, going missing etc. to be well safeguarded. There continue to be robust Quality Assurance processes in place, including a twice yearly Practice Week, which is now well embedded and which gives senior managers a real experience of the quality of work on the ground and foe practice to be evaluated and understood from the perspective of both staff and children and families. Areas for development identified during practice week are fed into the Quality Assurance Framework action plan. In addition there are monthly Practice and Outcomes Boards involving all relevant senior managers where performance data and information from audits and practice week are coalesced into action planning where this might be necessary. This approach to quality assurance has been praised by Ofsted in a recent Joint Targeted Area Inspection. The Workforce Strategy, in place since December 2016 and progressed via a monthly Recruitment and Retention group has led to a significant reduction in the use of agency staff and strong levels of permanent staff, which in turn creates greater consistency of practice and greater stability for families.	**Summary of Controls** Robust Quality Assurance processes in place. Training and development processes in place which give ongoing assurance regarding quality of work and adherence to legal framework	Develop action plan from recent Joint Targeted Area inspection [held December 2019] and published in January 2019 **TARGET COMPLETION: end March 2019** Continue to adhere to Quality Assurance Framework and to report regularly to Safeguarding Accountability Meeting and Scrutiny panel as necessary **TARGET COMPLETION: Ongoing**
10	2	5	**Risk Title** Serious H&S incident in housing **Risk** Serious Health and Safety incident in the council's housing stock **Cause** Non-compliance with statutory duties /regulations **Consequence** Multiple fatalities **Risk Trend** ⟷	The Homes & Estates Safety Board continue to meet quarterly to provide reassurance that our measures and systems are robust. We are continuing to work closely with the London Fire Brigade to identify vulnerable residents, this actively helps us to identify those residents that require additional support or equipment. Compliance with fire safety regulations. We continue to deliver fire safety action plan. Braithwaite cladding removed (should be replaced by early summer). Front door upgrades continue and contract for installation of inter-linked alarms in street properties now mobilised. Expanded Polystyrene (EPS) insulation removed from Fyfield and we are in the process of replacing it. Hungerford Road, we are currently specifying the cladding replacement, then will be procuring contractor to undertake work. Waking watch in place to mitigate risk.	Homes & Estates Safety Board provide challenge Ongoing delivery of Fire Safety Action Plan 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). Fire Risk Assessments for all 126 tall blocks have been completed and published online for transparency. Gas compliancy continues to be very strong – 99.93% at October 18. Front door upgrade programme underway. Contract for installation of inter-linked detection and warning systems in street properties let and mobilised, work expected to start in spring. Liaison with the Ministry of Housing, Communities and Local Government (MHCLG) and London Councils on emerging resident safety issues. Housing Directors Fire Safety Sub-Group – monthly meeting to review actions, include senior staff from the London Fire Brigade (LFB) and MHCLG. Cyclical testing for electrical, asbestos, legionella and construction risks remains on track.	Liaison with LFB and MHCLG to ensure we are on top of emerging issues. **TARGET COMPLETION: Ongoing** Engagement with government consultation on delivery of Hackitt recommendations, expected this spring. **TARGET COMPLETION: June 19.**

Risk Score	L	I	Risk	Activity Highlights	Summary of Controls	Actions and potential future controls
9	3	3	**Risk Title** IT delivery and transformation **Risk** We do not deliver IT projects which will enable/optimise business transformation across the Council **Cause** Insufficient planning/resourcing/funding to deliver the IT strategy. **Consequence** Operation disruption, additional cost, reputational damage **Risk Trend** ↑	We have withdrawn from Shared Digital with effect from 31st December 2018. The process of finalising the Shared Digital separation terms through the Transition Board, has largely been completed. The topics to be finalised in 2019 include the completion of the novation of shared contracts, processes for sharing the contracts that remain shared and the financial settlement. The Transition Board will oversee these outstanding items with members from each Council attending. The financial settlement from the 2017/18 financial year has still not been concluded and will impact the timing of the 2018/19 settlement. A new high level IT Strategy has been approved by CMB and a full business plan is now being constructed for approval in March 2019. This document will outline how we plan to rebuild Islington Digital Services as a high performing delivery unit and rebuild the technology infrastructure. The new strategy highlights the need to phase this activity starting with the IT foundations before moving up the value chain to transform our services to residents.	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. In addition, the interim organisational structure (established following the Shared Digital separation) has grouped IT the project managers into a new practice in which more formalised project disciplines have been introduced. This group is sharing the same processes, tools and methodologies as the central PMO to create greater transparency and control.	Our IT Business Plan will be presented to CMB in March, we will then focus on delivery of that plan to improve IT delivery across the Council. The Business Plan includes a functional review of our in-house capabilities; the proposed sourcing arrangements to engage external expertise; and the identification of critical infrastructure that is at or close to end-of-life. To support this, a set of appropriate architectural principles and guidelines will establish the roadmap for the remediation programme. Key roadmap decisions include the adoption of the Microsoft suite of products (including MS Project Server) to enable integration as well as the initiation of an ERP programme to underpin our core HR, Payroll and Finance functions. The budget is still being unravelled from the Shared Digital arrangement but it is clear that there will be budget pressures which will potential limit the rate of progress. **TARGET COMPLETION: Business Plan approval by end March 2019; infrastructure remediation will be planned subsequently and as resources and funding allows. Completion of all critical (out of support) remediation by August 2020.**

Risk Score	L	I	Risk	Activity Highlights	Summary of Controls	Actions and potential future controls
9	3	3	**Risk Title** Change Programme Delivery **Risk** Failure to implement change projects **Cause** Capacity, financial challenge, governance, project management. **Consequence** Change activity faces delay, declining quality and cost escalation, financial/other benefits are not met in full. **Risk Trend** NEW	Our MTFS is based on the realisation of a number of savings proposals, these proposals will be managed through our Programme Management Office (PMO). The PMO sits within the Chief Executive's office. The PMO is now been formed with all Corporate Directors taking responsibility for the delivery of change and transformation within their own directorates. A PMO Design and Compliance and Programme Delivery Board meet fortnightly in order to develop and review the governance structure of the PMO. The Programme Delivery Board is also established and meets fortnightly. All new business cases for change go through these boards to provide technical sign off on new initiatives and receive some corporate challenge to ensure the proposals are realistic and the benefits are deliverable. From March, each key programme or project will be monitored at the appropriate level, be it DMT for departmental initiatives or the relevant board for cross cutting initiatives. Highlight reports will be provided to PDB, and then onto CMB for review with appropriate escalation where benefits are considered at risk.	Programme Delivery Board – provides challenge and oversight of the savings proposals. Design and Compliance Authority Board – Provides challenge and ensures good governance for the PMO activities.	Continued embedment of the PMO **TARGET COMPLETION: Ongoing** The above includes a training programme defined in the P3M training framework, which includes project and risk management training Training Programme now underway, with first masterclasses delivered. Communications to go round on the online training module in the week of 25/2/19. Introducing Office Project Online, to support governance and management process **TARGET COMPLETION: Mandate for investment will go to Programme Delivery Board in March, and if agreed will aim for implementation in June**

Risk Score	L	I	Risk	Activity Highlights	Summary of Controls	Actions and potential future controls
8	2	4	**Risk Title** Welfare Reforms **Risk** Cannot efficiently collect rent following introduction of Universal Credit (UC) when housing support is paid directly to the claimant. Evictions and homelessness may also increase. **Cause** Government policy **Consequence** Vulnerable residents to significant new financial hardship. **Risk Trend** ⬆	Welfare reforms present a major challenge for the council and its residents. Changes such as the benefit cap (£23,000 pa/£15,000 pa for a single person) and roll out of Universal credit (June 2018) will impact the poorest residents, and are expected to lead to higher levels of rent arrears alongside the risk of greater financial hardship for vulnerable residents. There will also be a higher demand for advice services provided at our Customer Centre or by the Council funded Advice Alliance. Analysis has been carried out to identify affected residents, provide them with support in claiming UC, and to get back to work. We are instigating alternative payment arrangements so that housing support can continue to be paid directly to the landlord. Evidence shows that those who have moved over already to Universal Credit have significantly higher levels of rent arrears than previously and in comparison to other tenants in arrears. We continue to work closely with early adopter local authorities and pilot landlords/authorities to learn from their experiences and have planned further training for frontline staff next year as part of a rolling programme for staff.	Programme of support for residents, identifying most vulnerable and tailoring our support accordingly. We have reduced caseload/patch sizes for officers and are working more closely with VCS organisations in providing budgeting and access to employment advice and food bank support/advice. Use of analytical data to identify those most at risk from transferring to Universal Credit We have convened a joint member and senior officer group to ensure the council was fully prepared for the introduction of UC Full Service from June 2018 Co-ordinated cross-council response in conjunction with key external partners. Continue to disseminate key messages to residents and frontline staff about our approach and support in respect of UC Support the scrutiny review of UC by Policy and Performance Committee Monitor rent arrears, offer of alternative payment arrangements and provide advice service demand Formal and ongoing liaison with Depart of Work and Pensions (DWP) to discuss UC roll out and issues.	We are working to introduce direct debit payment options for our tenants across the month and staff have been trained as Digital Champions, which will include support to those who require it to navigate Universal Credit. **TARGET COMPLETION: January 2020** Develop further UC and refresher training rolling programme. **TARGET COMPLETION; July 2019** Reviewing our triage model at 222 Upper Street, along with our personal budgeting and digital support (in conjunction with DWP and Citizens Advice). **TARGET COMPLETION: August 2019** Scrutiny of Housing Benefit data through Policy in Practice to identify those most at risk from migration to UC, including families with children turning 5. **TARGET COMPLETION: May 2019** Liaison with partners organisations ongoing including engagement with pilots and lessons learned' events. **TARGET COMPLETION: Service development roll out 2019/20.**

Risk Score	L	I	Risk	Activity Highlights	Summary of Controls	Actions and potential future controls
8	2	4	**Risk Title** Health and safety **Risk** Significant Health and Safety Incident **Cause** Non-compliance with policies procedures **Consequence** Life Changing injury, fatality compromising the safety and wellbeing of service users, public or the workforce, potential enforcement action. **Risk Trend** ⬌	The Health and Safety Executive (HSE) are currently investigating an alleged occupational illness and the Council's management of vibrating tools. Depending on the outcome of their investigation, this could give rise to enforcement action and potential financial penalties. Employees with complex needs - Processes are being reviewed by Health and Safety in conjunction with HR. Review is actively looking at improving the 'on-boarding process', to ensure that personal emergency evacuation plans, specialist equipment and staff training which may be required to safely evacuate a member of staff are in place at the earliest opportunity. Lessons learned from a recent employment tribunal will also incorporated into the review. Legionella audit completed, incorporating Housing, Workplaces, Schools and Leisure Centres. Currently awaiting issue of the final report. Fire Safety audit of Council workplace buildings completed in January 2018. Key recommendation in relation to recording of Fire Risk Assessments (FRA) almost closed with introduction of new IT system. Recommendation for fire safety training is ongoing. Occupational Health and Safety Management System document is currently being reviewed/updated in conjunction with the Health and Safety Policy. Children's services audit completed in March 2018 and recommendations are currently being implemented.	Regular auditing of schools continues. Drug and Alcohol testing continues (random testing) for council employees and agency workers in safety critical roles. Annual reviews of Corporate policy, regular review of other Health and Safety policies. Health and Safety training included in corporate induction. Annual report to CMB (estimated May 2019)	Audit arranged with British Safety Council to review the Council's health and safety management arrangements. **TARGET COMPLETION: April/May 19.** Working group (HR and H&S) reviewing on-boarding process to ensure staff with complex needs are adequately provided for. **TARGET COMPLETION: June 19.** Asbestos module testing to be completed. **TARGET COMPLETION: August 19.** Health and Safety policy to be reviewed and presented to CMB **TARGET COMPLETION: May 19.** Annual health and safety performance report to CMB. **TARGET COMPLETION: May 19.** Audit of D&T audit in secondary schools to be commissioned in the next academic year **TARGET COMPLETION:** expected start in **September 2019.**

Risk Score	L	I	Risk	Activity Highlights	Summary of Controls	Actions and potential future controls
8	2	4	**Risk Title** Contract Management **Risk** Significant contractor failure/contractors failing to deliver within the agreed parameters (Quality, cost and schedule) **Cause** Ineffective/Non-compliance with corporate contract management procedure **Consequence** Service disruption, reduced quality of service, additional financial burden **Risk Trend** NEW	Internal Audit have completed a review of the strategic arrangements in place to oversee the Council's contracting with third parties. A deep-dive of operational contract management procedures was undertaken to provide evidence over the design and operation of controls at service-level, with particular regard to managing business disruptions, third-party processing of personal data, compliance with regulatory requirements and safeguarding of service users. We have seen an increasing number of third party provider failures, these failures have been a mixture of both financial and quality concerns. We were unaffected by the largest commercial contractor collapse, however we have experienced a recent example of provider failure within Adult Domiciliary Care, this prompted a cross council response to successfully mitigate and ensure continuity of service for residents. In view of these concerns and the findings of the audit report we have instigated a refresh of the corporate approach to contract management. Contract management is undertaken within each service by in-service contract managers. We are in the process of improving the corporate governance around this function to improve quality, discussion, control and consistency of contract management. The role of contract management will remain within services. Telephone support will be available from trained officers in Strategic Procurement. New and updated best practice guidance and templates are being added to the end of Procurement Toolkit. The Commissioning and Procurement Board have requested that Supply Chain Practitioners Group refresh the corporate governance for contract management. The refresh of this guidance will be thorough and include areas such as guidance on monitoring financial stability, risk management and improving supply chain understanding.	Corporate governance guidance exists for use by contract managers. Commissioning and Procurement Bboard to provide direction and oversight on all supply chain matters. The Supply Chain Practitioners Group (SCPG) – are responsible for improving and sharing best practice on operational supply chain matters, including contract management Training and advice is available ad hoc on specific contract management issues through procurement.	Implementing audit recommendations, this includes: Reviewing above guidance, Strategic Contact Management provision (toolkit standard guidance and documents). **TARGET COMPLETION: Finished by end 18/19 financial year** Allocating a Senior Manager and Manager under the Head of Service to provide Strategic Contract Management advice and contract financial assurance (operational contract management to remain within services). **TARGET COMPLETION: End of quarter one 2019/20** Strategic Procurement facilitating and co-ordinating under the SCPG actions to obtain best practice across the organisation and develop this into guidance, forms and templates for use at the end of the Procurement Toolkit. **TARGET COMPLETION: End of quarter one 2019/20** Commissioning and Procurement Board – To identify a schedule of contracts from which to receive/challenge information on contract management by Commissioning and Procurement Board. **TARGET COMPLETION: Compile list by end Q1 and commence review in Q2.** Commissioning and Procurement Board – To review contracts over £500k p/a where there are points of optional extension for justification of action to be taken. **TARGET COMPLETION: Done in conjunction with above.** Providing training to ensure new guidance is understood **TARGET COMPLETION: Roll-out planned Q2 2019/20 financial year.**

Risk Score	L	I	Risk	Activity Highlights	Summary of Controls	Actions and potential future controls
4	2	2	**Risk Title** Serious Fraudulent Activity **Risk** Serious Fraud or corruption **Cause** Lack of adequate governance arrangements including key controls. **Consequence** Financial and Reputational damage. **Risk Trend** ⬆	The Internal Audit, Risk and Investigations team is resourced to undertake reactive fraud investigations and continues to work with services to identify and mitigate fraud. The Fraud Forum is being refreshed and Chaired by the Head of Income and Home Ownership following the departure of the previous Director of Housing. The forum is reviewing the implementation plan and terms of reference to ensure they are fit for purpose and deliver operational benefits, the review is needed as the previous approach did not deliver the expected operational benefits. Fraud training has been developed and tested and is awaiting roll-out, we have encountered some operational issues with host system which has delayed the release of the training. . The whistleblowing policy has been updated and is currently in the process of Audit Committee approval. Our participation in the London Counter Fraud Hub (LCFH) pilot has progressed, we have attended a number of workshops and provided feedback to CIPFA throughout the testing phase. Other local authorities are currently being asked to express a commitment to join the hub .	Internal Audit and Corporate Investigations work closely ensuring that intelligence is shared, support the identification of fraud risks. Internal Audit and Investigations also work jointly on some investigations to ensure that Internal Audit are able to make recommendations to enhance controls and prevent recurrence of fraud. Corporate Investigations stay abreast of fraud alerts and fraud risks. A robust Anti-Fraud strategy and whistleblowing policy is in place. .	Refreshing the terms of reference and reporting route for Fraud Forum in March 2019 to ensure the forum' benefits are clearly defined and delivered. **TARGET COMPLETION: Summer 2019** Review the resourcing of the Corporate Investigations with a view to potentially increasing resource to improve our ability to pro-actively manage fraud. **TARGET COMPLETION: Summer 2019** HR to roll-out fraud training. **TARGET COMPLETION: Summer 2019** LCFH provides alerts of potential fraud for our further investigation. **TARGET COMPLETION: Ongoing as alerts come in**

PAPER ENDS