CITY OF WOLVERHAMPTON COUNCIL

Strategic Risk Assurance Map – September 2017

| Risk | Risk Title and Description | Current | | Types of Assurance | |
|------|----------------------------|---------|-------------------------|--------------------------|----------------------------|
| Ref | | Score | External/ Independent | Risk and Compliance | Operational and Management |
| | | | (Third Line of Defence) | (Second Line of Defence) | (First Line of Defence) |

Appendix B

Comments / Gaps in Assurance/Risk Exposure

| Risk | | Current | | Types of Assurance | | |
|------|--|------------|--|--|---|--|
| Ref | | Score | External/ Independent (Third Line of Defence) | Risk and Compliance (Second Line of Defence) | Operational and Management (First Line of Defence) | |
| 1 | Looked After Children (LAC) If the number of LAC is not reduced this may result in an increase in costs, budget overspends and an increased demand on children's services. | 5 Amber | Performance indicator- number of LAC per 10,000 population Audit and Risk Committee review of risk – September 2015 Internal audit review 2015/16 – External Placements (substantial assurance) Children's Services Ofsted Inspection January / February 2017 (Good Rating) | Scrutiny review of Corporate Parenting and Children in Care Council – September 2015 Resources panel reviews Update to Children's Trust Board- September 2014 Care panel reviews of placement costs Report to Cabinet (Performance Management Panel) September 2014 Scrutiny review of LAC February 2014 | Children's Services self- assessment December 2015 Reports to LAC Budget Monitoring Group (every two months) Controls Assurance Statement | |
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Present sources will continue to provide assurance regarding the changes in number of LAC. Assurances through the budgetary process regarding the cost of LAC need to be continually provided to ensure effective management of the budgetary pressures associated with this risk.

| Risk Ref | Risk Title and Description | Current Score | External/ Independent (Third Line of Defence) | Types of Assurance Risk and Compliance (Second Line of Defence) | Operational and Management (First Line of Defence) |
|-------------|---|------------------|---|--|---|
| 3 | Information Governance (IG) If the Council does not put in place appropriate policies, procedures and technologies to ensure: that the handling and protection of its data is undertaken in a secure manner and consistent with both the provisions of the Data Protection Act 1998 and the General Data Protection Regulation (GDPR) which comes into force during May 2018; compliance with the Freedom of Information Act and Environmental Information Regulations; then it may be subject to regulatory action, financial penalties, reputational damage and the loss of confidential information. | 8 Amber | Internal audit review 2014/15 – Information sharing agreements (Satisfactory assurance) Internal audit review- Protective marking compliance, September 2014 (Limited assurance) Internal audit review 2016/17 – Freedom of Information Requests (Substantial Assurance) Internal audit review 2016/17 – Information Governance (Satisfactory assurance) | Information risk register and reports to Information Governance Board Performance reports to Cabinet, Scrutiny Board and SEB Performance indicators reported to Cabinet- Number of data breaches Performance indicator - % of Freedom of Information (FOI) requests met within timescales Performance indicator- % of Subject Access Requests (SAR) met within timescales | Senior Information Risk Officer Annual Report Controls Assurance Statements |

The Council's on-going dialogue with the Information Commissioners Office, regular audits, performance against FOI and SAR requests and information incidence logs will all continue to inform the level of assurance over the effectiveness and adequacy of the controls in place to manage this risk.

| Risk Ref | Risk Title and Description | Current Score | External/ Independent (Third Line of Defence) | Types of Assurance Risk and Compliance (Second Line of Defence) | Operational and Management (First Line of Defence) |
|-------------|--|------------------|--|---|--|
| 4 | Medium Term Financial Strategy If the Council does not manage the risks associated with the successful delivery of its medium term financial strategy including the continual review of the assumptions and projections of the strategy, the effective management of the key MTFS programmes and projects then this may exhaust reserves, result in the potential loss of democratic control and the inability of the Council to deliver essential services and discharge its statutory duties. | 12 Amber | PwC report: Report to those charged with governance (ISA 260) September 2016 Independent review of process for MTFS and budget- E Sullivan, May 2014 Internal audit review Budgetary Control - 2015/16 (Satisfactory assurance) Internal audit review – 2014/15 Assumptions of the MTFS LGA Finance Peer review- June 2016 Audit and Risk Committee review of risk – December 2016 Internal audit review Budgetary Control – 2016/17 (Satisfactory assurance) LGA Finance Peer review follow up – September 2017 | MTFS risk register Reports to Budget Working Party Reports to Cabinet Scrutiny reviews of budget strategy Outcome of Local Government Finance Peer Review Report –Report to 3C Scrutiny Board 14 September 2016 Scrutiny review, 3C Scrutiny Board - Update on the implementation on the Local Government Finance Peer Review Report 15 March 2017 | Management accounts Controls Assurance Statements |
| 7 | Safeguarding If the Council's safeguarding procedures and quality assurance processes are not consistently and effectively implemented then it will fail to safeguard children and vulnerable adults and lead to reputational damage. | 8 Amber | West Midlands Association of Directors of Adult Social Services peer review – Adult safeguarding September 2014 West Midlands Association of Directors of Children's Services peer review- children's safeguarding September 2014 Internal audit review 2015/16 – Independent Reviewing Officer Service (satisfactory assurance) Internal audit review 2015/16 – Safeguarding in schools (satisfactory assurance) S.11 (Safeguarding self-Assessment) Audit 2016/17 Internal audit review 2016/17 – MASH (satisfactory assurance) Children's Services Ofsted Inspection January / February 2017 (Requires Improvement Rating) | Scrutiny review- Child Sexual Exploitation 2015/16 Adults and Safer City Scrutiny Panel Review- Violence against women and girls strategy September 2015 Annual reports from adults and children's local safeguarding boards 'Our Story' report to Cabinet Member for Children and Families National and local Wolverhampton performance indicators in relation to social care Self- audits confirmation by schools of s175 compliance Annual Reports from: IRO Service, Local Authority Designated Officer, Foster Home Reviewing Officer Safeguarding Adults Board Annual Review – Report to Adult and Safer City Scrutiny Panel 31 January 2017 | Children's Services self- assessment December 2015 Adults safeguarding self- assessment and action plan – June 2016 Quality Assurance Framework and assessments Controls Assurance Statement WSCB Self-Assessment against Ofsted Descriptors |
| 8 | Business Continuity Management Failure to develop, exercise and review plans and capabilities that seek to maintain the continuity of critical functions in the event of an emergency that disrupts the delivery of Council services. | 8 Amber | Internal audit review 2015/16 – Business continuity and resilience management (satisfactory assurance) Audit and Risk Committee review of risk – July 2016 | Reports from Wolverhampton Resilience Board to SEB Strategic Business Continuity Plan, approved by SEB | Controls Assurance Statement Implementation of the Apprise Co- ordination system Completed Priority 1 Business Continuity Plans Development of tactical loss of building plan |

Ongoing internal and external reviews will continue to provide assurances over the successful delivery of the MTFS and the achievement of efficiency savings.

Regular updates to the both the Children's and Adult's Board(s) and People management teams with regards to the implementation of recommendations made by Ofsted will provide further assurance.

The exercise and testing programme once developed and implemented will provide further assurances on the management of this risk.

Given the continual reductions in the Council's workforce, ongoing testing will be required to provide assurance over the resilience of the provision of Council services.

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| Risk Ref | Risk Title and Description | Current Score | External/ Independent (Third Line of Defence) | Types of Assurance Risk and Compliance (Second Line of Defence) | Operational and Management (First Line of Defence) |
| 9 | City Centre Regeneration If the city centre regeneration programme is not effectively managed in terms of project timings, costs and scope, then it will be unable to maximise opportunities including: • creation of well-paid employment • retention of skilled workers • sector and economic growth • increased prosperity and • reduced demand on council services | 12 Amber | Internal audit review 2015/16- City centre development (Satisfactory assurance) | Programme and project risk registers / risk monitoring through Verto Monthly reporting to the City Centre Regeneration Programme Board Stronger City Economy Scrutiny Panel Review 2016/17 – Regeneration programmes | Reports to Programme Board from project managers Controls Assurance Statement |
| 14 | School Improvement If the Council does not provide effective support, challenge and appropriate intervention to raise standards in schools, then the Council and these schools are at risk of underperforming, receiving inadequate Ofsted judgements and a potential loss of control and influence. | 8 Amber | Ofsted annual report – Schools 2014/15, December 2015 Ofsted inspections 2015/16, 2016/17 and 2017/18 to date. School internal audit reviews 2015/16, 2016/17 and 2017/18 to date. Internal audit review 2015/16 – School Improvement and Governance Strategy (satisfactory assurance) Audit and Risk Committee review of risk – February 2017 Internal audit review 2016/17 – Vulnerable Pupils | Performance indicator – gaps in educational performance Performance indicator – end of key stage outcomes Report to Children and Young People and Families Scrutiny Panel – School Improvement Strategy July 2016 Report to Children and Young People and Families Scrutiny Panel - Local Authority School Improvement Inspection Self- Evaluation July 2016 Report to Children and Young People and Families Scrutiny Panel- Primary School Organisation strategy July 2015 Report to Children and Young People and Families Scrutiny Panel- Academy Partnership Protocol April 2016 Report to Children and Young People and Families Scrutiny Panel – Secondary School Sufficiency Strategy April 2016 Report to Children and Young People and Families Scrutiny Panel – Improving Our Schools Annual Report 2016 April 2016 Audits carried out by School Support Advisors and External Governance reviews | Reports to Cabinet Controls Assurance Statement Individual school SFVS statements |
| 15 | Emergency Planning Failure to develop, exercise and review plans and capabilities for preventing, reducing, controlling or mitigating the effects of emergencies in both the response and recovery phases of a major incident. Failure to train sufficient numbers of staff to undertake the roles in our plans that assist our residents in emergencies and protect the council's reputation from damage. Failure to audit the emergency response plans and capabilities of third party organisations that deliver statutory services on behalf of the council. | 8 Amber | Follow up of internal audit recommendations, January 2014 Audit and Risk Committee review of risk – July 2017 | Reports to Wolverhampton Resilience Board (WRB) Regular reports from WRB to SEB and C3 Scrutiny Panel | Controls Assurance Statement |

Regular update reports to Programme Board(s) and Cabinet continue to provide assurance on the management of this risk.

The Ofsted inspections and annual report(s) will continue to be the primary source of assurance for this risk.

The exercise and testing programme, once developed and implemented will provide further assurances on the management of this risk. In the meantime, unplanned incidences and the lessons learned from these exercises continue to provide some level of assurance.

| Risk Ref | Risk Title and Description | Current Score | External/ Independent (Third Line of Defence) | Types of Assurance Risk and Compliance (Second Line of Defence) | Operational and Management (First Line of Defence) |
|-------------|---|------------------|---|--|--|
| 21 | Transforming Adult Social Care (TASC) If the Council does not have robust management and governance arrangements in place for the Transforming Adult Social Care Programme, then it may be unable to effectively manage demand and deliver the targets of the significant savings challenge the service needs to make as part of the MTFS. | 12 Amber | Birmingham City Council – Wolverhampton Adult Social Care Peer Challenge, March 2016 Financial Decision Making Audit Services Review Follow up – Wolverhampton Adult Social Care Peer Challenge, April 2017 Internal audit review(s) - Adult Social Care | Reports to Transforming Adult Social Care (TASC) Board Regular reports from TASC Board to SEB Resources Panel reviews Programme and project risk registers Various TASC KPI's and performance measures | Controls Assurance Statement |
| 22 | Skills for Work and Economic Inclusion If the city residents do not have the appropriate skills that employers require and the Council does not work effectively with its partners to promote and enable growth, high rates of unemployment and economic inclusion will result in increased demand for Council Services. | 10 Amber | Reports to the Black Country Local Enterprise Partnership and City Board National performance indicators e.g. % residents unemployed, child deprivation, skills profile, etc. Wolverhampton Skills Commission Review – November 2014 to April 2015 Skills and Employment Board Audit and Risk Committee review of risk – September 2016 and December 2015 Wolverhampton Skills Commission Review – November 2014 to April 2015 Internal audit review – City of Wolverhampton College- Learners with learning difficulties post 16, December 2014 Black Country performance management framework | Stronger City Economy Scrutiny Panel Review – Investment and Funding July 2016 Report to SEB – City Board – Monthly unemployment briefings Scrutiny review of "Employability and Skills in Wolverhampton" report to Cabinet 11 March 2015 Scrutiny review of "Employability and Skills" September 2014 – January 2015 Performance indicator - % of residents with no qualification Performance indicator - number of work experience/ volunteering/ apprenticeships opportunities provided Monthly unemployment briefings Scrutiny Skills and Employment Update – Report to Stronger City Economy Scrutiny Panel – 20 September 2016 Skills and Employment Update(s) regularly presented to Stronger City Scrutiny Panel | Reports to the Wolverhampton Skills and Employment Board growth board Inclusion board Controls Assurance Statement |
| 23 | Cyber Security Failure to maintain a high level of cyber security (technology, processes and awareness) throughout the Council may result in cyber-attacks and theft or loss of confidential data leading to financial penalties, reputational damage and a loss in public confidence. | 15 Red | Annual Public Service Network (PSN) certification Independent testing of cyber security technical defences Use of 3 rd party software to stimulate email phishing attacks Audit and Risk Committee review of risk – July 2017 Internal audit review - ICTS Strategic Planning | Information risk register and reports to Information Governance Board Reports to SEB and Cabinet (Performance Monitoring) | Regular maintenance and review of technical defence's i.e. fire walls and virus software. Senior Information Risk Officer Annual Report Appointment of Chief Cyber Security Officer Controls Assurance Statements |

Ongoing reviews will continue to provide assurances over the successful delivery of the TASC programme and the achievement of savings targets in the MTFS.

National indicators will demonstrate the effectiveness of the measures in place to manage this long-term risk.

In addition, assurances received at a regional level (e.g. through the West Midlands Combined Authority) will also inform the adequacy and effectiveness of the regional initiatives being employed to manage this risk.

Independent testing of the Council's cyber security defences will continue to provide assurance.

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|-------------|---|------------------|---|---|---|
| 24 | Maximising Benefits form West Midlands Combined Authority If the Council does not put in place effective co-ordination arrangements to utilise the opportunities available from being part of West Midlands Combined Authority (WMCA) it will be unable to maximise the benefits and opportunities available to it. | 6 Amber | SEP monitoring via WMCA SEP Board and Black Country LEP. WMCA Assurance framework Reports to WMCA Board and various Committees City of Wolverhampton Council providing the internal audit service for WMCA | Regular reports to SEB Representation on WMCA Boards and Committee's including Audit Risk and Assurance Committee and Overview and Scrutiny Committee. Update on the West Midlands Combined Authority – Report to Scrutiny Board 17 January 2017 | Appointment of Business Support Officer Controls Assurance Statement |
| 25 | Payment Card Industry Data Security Standard If the Council does not put in place appropriate systems, procedures and technologies to ensure agent-led telephone payments are compliant with the Payment Card Industry Data Security Standard there is a risk of data breaches and which may result in regulatory action, financial penalties and reputational damage. | 8 Amber | Advice provided by the Payment Card Industry | Progress reporting to the Hub Management / Customer Services Management Teams Compliance with contract procedure rule / liaison with Corporate Procurement | Controls Assurance Statement |
| 26 | Community Cohesion There is a risk of an escalation in community tensions in response to external influences i.e. Terrorism, national policy changes e.g. Brexit and national events such as riots. | 6 Amber | Partnership working with West Midlands Police and various community groups / faith leaders | Regular meetings of the Community Cohesion Forum Quarterly returns to Police and Crime Commissioner SWP Board monitoring of the objectives within the Community Safety and Harm Reduction Strategy | Daily monitoring of hate crime figures and reports of community unrest |
| 27 | Safety concerns around the City's tower blocks Following the recent tragic events at Grenfell Tower in London, there is an urgent need for the Council to ensure that the tower blocks in the City do not face the same risks, and that tenants can be assured on this. | 10 Amber | Independent testing by a Government approved laboratory – confirming that tower-bocks have passed fire safety tests. Review of emergency access to tower- blocks by the Fire-Service Audit and Risk Committee review of risk – July 2017 | Regular reporting of fire safety issues to weekly fire safety meetings Reports from fire safety meetings to Senior Officers / SEB Reports to Scrutiny Scoping Group – Fire Safety in tower-blocks | Daily fire safety checks Implementation of Fire Risk Assessments (Type 4 FRS's) Continuing compliance with Fire Regulatory (Fire Safety) Reform Order 2005 On-going consultation with residents |

Council representation on key WMCA Boards and Committees will continue to provide assurance.

The implementation of a 3rd party solution to take and process payment details on behalf of the Council will ensure compliance with the Payment Card Industry standard and transfer the risk of fraud to the 3rd party.

The low numbers of reported instances continue to provide assurance that this area is well managed.

Joint work with Wolverhampton Homes, the Fire Service and specialist contractors is on-going to review fire safety and provide assurance to residents.