

Strategic Risk Assurance Map – August 2019

| Risk Ref | Risk Title and Description   | Current Score | Types of Assurance   |  |  | Comments / Gaps in Assurance/Risk Exposure   |
|----------|--|---------------|--|--|--|--|
|          |  |               | External/ Independent (Third Line of Defence)  | Risk and Compliance (Second Line of Defence)   | Operational and Management (First Line of Defence)   |  |
| 3        | <p><b>Information Governance (IG)</b><br/>If the Council does not put in place appropriate policies, procedures and technologies to ensure:</p> <ul style="list-style-type: none"> <li>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 came into force during May 2018;</li> <li>compliance with the Freedom of Information Act and Environmental Information Regulations;</li> </ul> <p>then it may be subject to regulatory action, financial penalties, reputational damage and the loss of confidential information.</p> | 8<br>Amber    | <p>Internal audit review 2016/17 – Freedom of Information Requests (Substantial Assurance)</p> <p>Internal audit review 2016/17 – Information Governance (Satisfactory assurance)</p> <p>Internal audit Health-Check 2018/19 – GDPR (Satisfactory assurance)</p>   | <p>Information risk register and reports to Information Governance Board</p> <p>Performance reports to Cabinet, Scrutiny Board and Strategic Executive Board (SEB)</p> <p>Reporting to the Information Governance Board</p> <p>Performance indicators reported to Cabinet- Number of data breaches</p> <p>Performance indicator - % of Freedom of Information (FOI) requests met within timescales</p> <p>Performance indicator- % of Subject Access Requests (SAR) met within timescales</p> <p>Records Management Programme updates in Verto</p> | <p>Senior Information Risk Officer Annual Report</p> <p>Controls Assurance Statements</p>  | <p>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.</p> |
| 4        | <p><b>Medium Term Financial Strategy</b><br/>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 such as the transformation of Adults and Children's services then revenues may be exhausted, resulting in the potential loss of democratic control and the inability of the Council to deliver essential services and discharge its statutory duties.</p>  | 16<br>Red     | <p>Assumptions of the MTFS</p> <p>Local Government Association (LGA) Finance Peer review- June 2016</p> <p>Audit and Risk Committee review of risk – December 2016</p> <p>Internal audit review Budgetary Control – 2016/17 (Satisfactory assurance)</p> <p>Performance indicator- number of Looked After Children (LAC) per 10,000 population</p> <p>Financial Decision Making Audit Services Review</p> <p>Birmingham City Council – Wolverhampton Adult Social Care Peer Challenge, March 2016</p> <p>Follow up – Wolverhampton Adult Social Care Peer Challenge, April 2017</p> <p>Grant Thornton – Review Significant Risks (2016/17 Audit Findings Report) – Risk sufficiently managed</p> <p>LGA Finance Peer review follow up – September 2017</p> <p>Internal audit review Main Accounting – 2017/18 (Satisfactory assurance)</p> <p>Internal audit review Main Accounting – 2018/19 (Satisfactory assurance)</p> | <p>MTFS risk register</p> <p>Reports to Budget Working Party</p> <p>Reports to Cabinet</p> <p>Scrutiny reviews of budget strategy</p> <p>Outcome of Local Government Finance Peer Review Report –Report to 3C Scrutiny Board 14 September 2016</p> <p>Scrutiny review, 3C Scrutiny Board - Update on the implementation on the Local Government Finance Peer Review Report 15 March 2017</p> <p>Resources panel reviews</p> <p>Care panel reviews of placement costs</p>   | <p>Management accounts</p> <p>Reports to LAC Budget Monitoring Group (every two months)</p> <p>Controls Assurance Statements</p> | <p>Ongoing internal and external reviews will continue to provide assurances over the successful delivery of the MTFS and the achievement of efficiency savings.</p>   |

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| 7        | <p><b>Safeguarding</b></p> <p>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.</p>  | 10<br>Amber   | <p>S.11 (Safeguarding self-Assessment) Audit 2016/17</p> <p>Internal audit review 2016/17 – MASH (satisfactory assurance)</p> <p>Children's Services Ofsted Inspection January / February 2017 (Requires Improvement Rating)</p> <p>Children's Services Ofsted Inspection January / February 2017 (Good Rating)</p> <p>Grant Thornton – Review Significant Risks (2016/17 Audit Findings Report) - Risk sufficiently managed</p> <p>Ofsted Inspection Sept / Oct 2018</p> <p>Independent review of Safeguarding Boards</p> | <p>Annual reports from adults and children's local safeguarding boards</p> <p>'Our Story' report to Cabinet Member for Children and Families</p> <p>National and local Wolverhampton performance indicators in relation to social care</p> <p>Self- audits confirmation by schools of s175 compliance</p> <p>Annual Reports from: IRO Service, Local Authority Designated Officer, Foster Home Reviewing Officer</p> <p>Safeguarding Adults Board Annual Review – Report to Adult and Safer City Scrutiny Panel 31 January 2017</p> | <p>Quality Assurance Framework and assessments</p> <p>Controls Assurance Statement</p> <p>WSCB Self-Assessment against Ofsted Descriptors</p>  | <p>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.</p>  |
| 8        | <p><b>Business Continuity Management, Including Brexit Implications</b></p> <p>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.</p>   | 16<br>Red     | <p>Audit and Risk Committee review of risk – July 2016</p> <p>Internal audit review 2018/19 – Business continuity and resilience management (satisfactory assurance)</p> <p>Scrutiny from LRF and neighbouring Local Authorities</p>   | <p>Reports from Wolverhampton Resilience Board to SEB</p> <p>Strategic Business Continuity Plan, approved by SEB</p> <p>Approval of emergency plans / business continuity plans from SEB</p>  | <p>Controls Assurance Statement</p> <p>Implementation of the Apprise Co-ordination system</p> <p>Implementation of Strategic control group</p> | <p>The exercise and testing programme once developed and implemented will provide further assurances on the management of this risk.</p> <p>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.</p> |
| 9        | <p><b>City Centre Regeneration</b></p> <p>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:</p> <ul style="list-style-type: none"> <li>• creation of well-paid employment</li> <li>• retention of skilled workers</li> <li>• sector and economic growth</li> <li>• increased prosperity and</li> <li>• reduced demand on council services</li> </ul>   | 12<br>Amber   | <p>External advice – Equib</p>   | <p>Programme and project risk registers / risk monitoring through Verto</p> <p>Monthly reporting to the City Centre Regeneration Programme Board</p> <p>Stronger City Economy Scrutiny Panel Review 2016/17 – Regeneration programmes</p> <p>Reviews by the Project Assurance Group (PAG)</p> <p>Reports and approvals from Cabinet / Full Council</p> <p>Reporting to Member Reference Group</p>   | <p>Reports to Programme Board from project managers</p> <p>Controls Assurance Statement</p>  | <p>Regular update reports to Programme Board(s) and Cabinet continue to provide assurance on the management of this risk.</p>  |
| 15       | <p><b>Emergency Planning</b></p> <p>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.</p> | 12<br>Amber   | <p>Audit and Risk Committee review of risk – July 2017</p> <p>Internal audit review 2018/19 – Business continuity and resilience management (satisfactory assurance)</p>   | <p>Reports to Wolverhampton Resilience Board (WRB)</p> <p>Regular reports from WRB to SEB and C3 Scrutiny Panel</p>   | <p>Controls Assurance Statement</p>  | <p>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.</p>  |

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| 22       | <p><b>Skills for Work and Inclusive Growth</b></p> <p>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 low inclusive growth will result in increased demand for Council Services.</p> | 10<br>Amber   | <p>Reports to the Black Country Local Enterprise Partnership and City Board</p> <p>National performance indicators e.g. % residents unemployed, child deprivation, skills profile, etc.</p> <p>Skills and Employment Board</p> <p>Audit and Risk Committee review of risk – September 2016</p> <p>Black Country performance management framework</p> <p>Grant Thornton – Review Significant Risks (2016/17 Audit Findings Report) - Risk sufficiently managed</p> <p>Internal Audit Review – IMPACT 2018/19 Satisfactory</p> | <p>Stronger City Economy Scrutiny Panel Review – Investment and Funding July 2016</p> <p>Report to SEB – City Board –</p> <p>Monthly unemployment briefings</p> <p>Performance indicator - % of residents with no qualification</p> <p>Performance indicator - number of work experience/ volunteering/ apprenticeships opportunities provided</p> <p>Monthly unemployment briefings</p> <p>Scrutiny Skills and Employment Update – Report to Stronger City Economy Scrutiny Panel – 20 September 2016</p> <p>Skills and Employment Update(s) regularly presented to Stronger City Scrutiny Panel</p> | <p>Reports to the Wolverhampton Skills and Employment Board growth board</p> <p>Inclusion board</p> <p>Controls Assurance Statement</p>   | <p>National indicators will demonstrate the effectiveness of the measures in place to manage this long-term risk.</p> <p>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.</p> |
| 23       | <p><b>Cyber Security</b></p> <p>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.</p>                                   | 12<br>Amber   | <p>Annual Public Service Network (PSN) certification</p> <p>Independent testing of cyber security technical defences</p> <p>Use of 3<sup>rd</sup> party software to stimulate email phishing attacks</p> <p>Audit and Risk Committee review of risk – July 2017</p> <p>Audit and risk Committee review of risk – May June 2019</p> <p>Internal audit review - ICTS Strategic Planning</p> <p>Cyber Security Essentials <a href="#">Plus</a> certification</p>  | <p>Information risk register and reports to Information Governance Board</p> <p>Reports to SEB and Cabinet (Performance Monitoring)</p>   | <p>Regular maintenance and review of technical defence's i.e. fire walls and virus software.</p> <p>Senior Information Risk Officer Annual Report</p> <p>Appointment of Chief Cyber Security Officer</p> <p>Controls Assurance Statements</p> | <p>Independent testing of the Council's cyber security defences will continue to provide assurance.</p>   |
| 24       | <p><b>Maximising Benefits form West Midlands Combined Authority</b></p> <p>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.</p>      | 6<br>Amber    | <p>SEP monitoring via WMCA SEP Board and Black Country LEP.</p> <p>WMCA Assurance framework</p> <p>Reports to WMCA Board and various Committees</p> <p>City of Wolverhampton Council providing the internal audit service for WMCA</p> <p>Grant Thornton – Review Significant Risks (2016/17 Audit Findings Report) - Risk sufficiently managed</p>  | <p>Regular reports to SEB</p> <p>Representation on WMCA Boards and Committee's including Audit Risk and Assurance Committee and Overview and Scrutiny Committee.</p> <p>Update on the West Midlands Combined Authority – Report to Scrutiny Board 17 January 2017</p>   | <p>Appointment of Business Support Officer</p> <p>Controls Assurance Statement</p>  | <p>Council representation on key WMCA Boards and Committees will continue to provide assurance.</p>   |

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| 25       | <p><b>Payment Card Industry Data Security Standard</b></p> <p>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.</p>  | 4<br>Amber    | <p>Advice provided by the Payment Card Industry</p> <p>Internal Audit Review – PCI Compliance 2018/19 Satisfactory</p>   | <p>Progress reporting to the Hub Management / Customer Services Management Teams</p> <p>Compliance with contract procedure rule / liaison with Corporate Procurement</p> <p>Reports to Project Assurance Group (PAG)</p> <p>Reports to Commercial Business Improvement Programme Board (CBIP)</p>  | Controls Assurance Statement  | The implementation of a 3 <sup>rd</sup> 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 3 <sup>rd</sup> party.    |
| 27       | <p><b>City assurance of response and compliance with the requirements of National Building Safety Programme, Grenfell Inquiry Report Recommendations and MHCLG Building Regulation Guidance Advice Notice(s)</b></p> <p>There is a risk of injury to members of the public, reputational damage, exposure to regulatory action and financial penalties to Council if appropriate processes and controls to ensure compliance with the requirements of the National Building Safety Programme, Grenfell Inquiry Report Recommendations and MHCLG Building Regulation Guidance Advice Notice(s).</p> | 10<br>Amber   | <p>Independent testing by a Government approved laboratory – confirming that tower-bocks have passed fire safety tests.</p> <p>Independent assurance / review from West Midlands Fire Service</p> <p>Audit and Risk Committee review of risk – July 2017</p> | <p>Regular reporting of fire safety issues to weekly fire safety meetings</p> <p>Reports from fire safety meetings to Senior Officers / SEB</p> <p>Reports to Scrutiny Scoping Group – Fire Safety in tower-blocks</p> <p>Regular meetings with TMO Managing Agents Group, Wolverhampton Homes Asset Management Group and the Safer Highrise Homes Group.</p> <p>Reports to Corporate Fire Safety Board and Cabinet.</p> | <p>Daily fire safety checks</p> <p>Implementation of Fire Risk Assessments (Type 4 FRS's)</p> <p>Continuing compliance with Fire Regulatory (Fire Safety) Reform Order 2005</p> <p>On-going consultation with residents</p> | Joint work with Wolverhampton Homes, the Fire Service and specialist contractors is on-going to review fire safety and provide assurance to residents.   |
| 28       | <p><b>Health and Safety</b></p> <p>Through failure to use safe working methods the Council may be exposed to regulatory action, financial penalties and reputational damage.</p>   | 8<br>Amber    | <p>Key Performance Indicators:</p> <ul style="list-style-type: none"> <li>Completed Health and Safety audits</li> <li>Compliance with RIDDOR reporting</li> </ul>  | <p>Bi-weekly Health and Safety Meetings Strategic Director Place</p> <p>Senior management briefings and presentations, including reports to Wolverhampton Homes Board</p>  | Regular Health and Safety audits in accordance with audit schedule.   | The number of reported incidents will continue to provide assurance in this area. In addition, approval of the Health and Safety plan 2017-19 and monitoring of targets set out within the plan will provide assurance that controls are in place. |
| 29       | <p><b>Fire Safety – Public Buildings</b></p> <p>If the Council does not have in place appropriate systems to ensure compliance with the Regulatory Reform (Fire Safety) Order 2005 within public buildings (including schools) there is a risk of injury to members of the public and exposure to regulatory action, financial penalties and reputation damage to the Council.</p>   | 10<br>Amber   | External inspections by the Fire-Service   | <p>Scrutiny review -Fire Safety</p> <p>Monitoring of FRA's by Corporate Landlord</p>   | <p>Completion of Fire Risk Assessments</p> <p>Development of online fire logs.</p> <p>Regular Health and Safety audits in accordance with schedule</p> <p>Appointment of Site Duty-Holders.</p>                             | Work is on-going to ensure that sufficient systems and processes are in place to comply with regulations and public safety.  |
| 30       | <p><b>Civic Halls</b></p> <p>There is a significant reputational and financial risk to the Council and to the City's wider visitor economy if the revised Civic Halls refurbishment programme is not effectively managed in terms of project timings, costs and scope.</p>   | 16<br>Red     | <p>Audit Services Lessons Learnt Review – 2017/18</p> <p>External advice – Equib</p>   | <p>Ongoing risk assessment / risk register within Verto.</p> <p>Risk workshops</p> <p>PAG reviews and monitoring</p> <p>Reports to Member Reference Group</p>  | Establishment of new governance and project management structure.   | Regular update reports to Programme Board(s), Cabinet and on-going risk assessments will provide assurance on the management of this risk.   |

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| 32       | <b>Waste Management Services</b><br>If the Council does not manage the changes to Waste Service Delivery effectively there is a risk that savings targets will not be delivered, and reputational damage may be incurred due to issues with waste collections.  | 4<br>Amber    | Internal Audit Review – Waste Services and Future Contract Arrangements (Substantial assurance)<br>Audit and Risk Committee review of risk – September 2018   | Programme and project risk registers / risk monitoring through Verto<br>PAG reviews and monitoring<br>Performance and progress reports to Cabinet, and Strategic Executive Board (SEB)<br>Reports to Member Reference Group<br>Scrutiny review – Changes to Waste Management Services | Establishment of project management structure<br>Project Manager<br>Appointment Lead officer – Waste | Regular update reports to Programme Board(s), Cabinet and on-going risk assessments will provide assurance on the management of this risk.   |
| 36       | <b>Parent company assurance of Tenant Management Organisations (TMOs)</b><br><br>There is a risk to the safety of residents if assurance cannot be provided that adequate management and safety controls are in place within TMOs.  | 12<br>Amber   | Independent internal audit reviews<br>TMOs 2017/18- Limited Assurance   | Support programme for TMOs<br>Implementation of improved KPI's  | Controls Assurance Statements<br>Implementation of revised TMO Management agreements                 | Ongoing support to TMOs as agreed in the support programme and monitoring of improved KPI's will provide assurance on the management of this risk.                                     |
| 37       | <b>Governance of Major Capital Projects and Programmes</b><br>The Council will fail to maximise opportunities and incur significant reputational and financial risks if it does not continue to manage, monitor and review major capital projects effectively, particularly in terms of project timescales, achievement of milestones and costs | 8<br>Amber    | Audit services Lessons Learnt Reports – 2017/18<br>Audit and Risk Committee monitoring of lessons learnt action plans<br>Independent project gateway reviews<br>Equip – Independent / external project and risk assurance | Programme and project risk registers / risk monitoring through Verto<br>PAG reviews and monitoring<br>Performance and progress reports to Cabinet, and Strategic Executive Board (SEB)<br>Reports to Member Reference Group   | Project Management Methodology<br>Controls Assurance Statements                                      | The Audit and Risk Committee will monitor the implementation of all recommendations within the Lessons Learnt Action Plan to ensure that improvements are put in place and adhered to. |