Authors

Nicola Kneale, Iolo McGregor, Heidi Barton-Price, Carol A Evans, Emma Horan & Natasha Hughes **Authors**

Executive Summary

Programme Code CRR

Programme Name Corporate Risk Register

Project Role Programme Support

Vision

Justification and Context

Fit with Relevant Strategies

Outcomes and Benefits

Delivery Approach and Reporting Processes

Delivery Approach

Reporting Processes

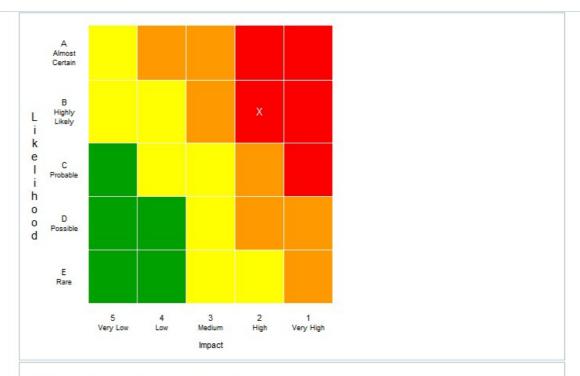
Description

Impact / Consequences

This risk - concerning children and adults at risk - is increasing as the environment is changing, with growing expectations around our duties in relation to 3rd party provision. The cumulative impact of reducing resources across the public sector may impact agencies' ability to appropriately recognise safeguarding risks which may also create extra pressures for the Local Authority.

- Significant reputational loss.
- 2. Possible intervention by Welsh Government.
- Legal/compensation costs.

Inherent Risk



Controls to Manage Risk (in place)

- 1. Safeguarding policy & procedures are in place
- 2. Corporate Safeguarding Training Programme.
- 3. Wales Interim Policy & Procedures for the Protection of Vulnerable Adults from Abuse.
- 4. Framework of self-assessment for schools in relation to safeguarding has been established.
- Section 28 Audits, and annual reporting requirement for services to demonstrate how they are discharging their duties in relation to safeguarding.
- 6. Section 28 audit tool in place for voluntary sector to ensure safeguarding practices are in place.
- Compliance with safeguarding practises is part of the annual HR audit of schools.
- 8. Regional arrangements for safeguarding a) children and b) adults at risk are in place. The regional safeguarding boards set priorities and actions regionally, eg training and policies & procedures.
- 9. Denbighshire Leadership Conference focussed on Safeguarding, November 2014
- 10. Risk assessments in place for recruiting staff who require a DBS check and/or references
- 11. Safeguarding policy review has taken place with Schools and new guidance has been developed
- 12. Corporate Safeguarding Panel has been reviewed including the terms of reference, roles and responsibilities.
- 13. Heads of Service have been asked to ensure they consider safeguarding when reviewing their risk registers and that safeguarding be included in service challenge where appropriate.
- 14. Key posts within the Council that could have an impact on safeguarding have been identified and Heads of Service are reviewing the posts to ensure that adequate checks are undertaken by the Council or and external body. All new employee contracts make reference to safeguarding.
- Briefing sessions on safeguarding and Child Sexual Exploitation have been delivered to County Council and the Leader has included corporate safeguarding in his protfolio.
- 16. Improvements have been made to safeguarding arrangements with contractors including (i) DBS contract checks, (ii) ensuring that Council staff responsible on site for the contractor and managing the tendering / contract process are clear of thier responsibilities in respect of safeguarding, (iii) ensuring contacts terms and conditions (including JCT) in relation to DBS checks are appropriate, (iv) ensuring that self-assessment arrangements as part of contract management are appropriate.
- 17. The Corporate Safeguarding Policy has been reviewed and updated in line with new legislation.



Further Actions

00061 Develop a formal mechanism for recording and sharing safeguarding incidents and near misse

Description

This is a standing item on the Corporate Safeguarding Panel agenda. We will also share case reviews where there is a corporate perspective for lessons learned.

As part of the development of the CRM system, we will look at the feasibility of having a corporate system for recording safeguarding incidents.

Service representatives will report any key messages from Panel meetings to members of staff within their services.

Action Due Date

30/06/2017

Person Responsible

Person Responsible

Nicola Stubbins

00076 Monitor the completion of the Safeguarding e-learning module

Description Report on the percentage of staff that have completed the safeguarding e-learning package

Action Due Date 30/06/2018

Nicola Stubbins

Lead Member(s) Cllr Bobby Feeley & Cllr Huw Hilditch-Roberts

Yes

Risk Owner Nicola Stubbins

00006 The risk that the economic and financial environment worsens beyond current expectations, leading to additional demand on services and reduce income

Description

Active

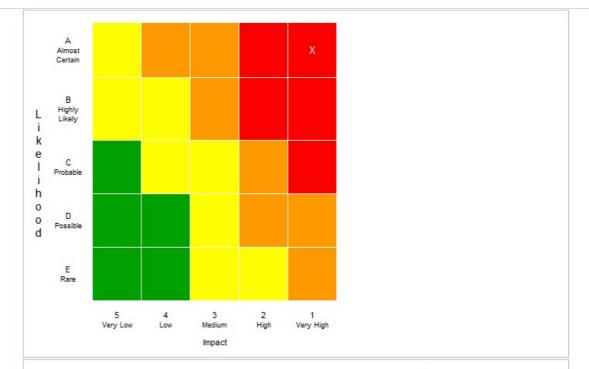
The latest settlement was equal to the lowest anticipated, and the next one will probably also be very low, affecting our ability to effectively plan for the medium term.

Impact / Consequences

The council suffers from a significant reduction in income, leading to an inability to deliver current levels of service provision.

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Inherent Risk



Controls to Manage Risk (in place)

- The council has no control over the global economy or the WG settlement. Therefore the inherent risk score likely to remain high.
- 2. Annual, detailed budget setting process that considers economic environment
- The Medium Term Financial Plan (MTFP) contains different scenarios to ensure it can deal with changes in the external environment, and is considered on a quarterly basis: it has revised its expectations further downwards.
- A robust budget-setting process raises awareness of implications of significantly reduced income due to the economic environment. It also identifies a range of proposals should cuts be incurred.
- Regular (usually monthly) financial planning meetings between services and management accountants are in place.
- Service's budgets and budget proposals are scrutinised by the Lead Member for Finance and the Head of Service during budget-setting talks.
- 7. Establishment of the 'Reshaping the Council Budget' programme board.

Residual Risk



Further Actions

Lead Member(s)

Active

Risk Owner

Councillor Julian Thompson-Hill

Yes

Mohammed Mehmet

00011. The risk of an ineffective response to a severe weather contamination, public safety (including cyber attack) or public health event

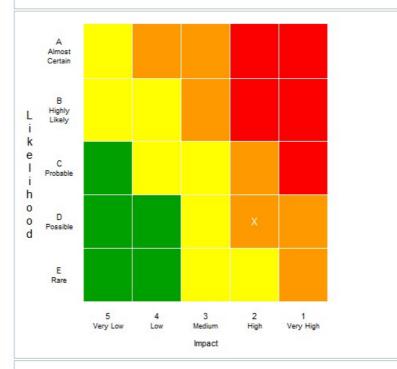
Description

Impact / Consequences

Inherent Risk

Services plan for the impact of expected seasonal variations in weather, but severe weather events can impact on service delivery. Similarly, we put plans in place to monitor food, water and air quality, but any contaminations can impact on service delivery, as would any viral pandemics. Cyber attacks can affect our ability to provide services electronically, putting our business continuity plans to the test.

- Significant disruption to core services.
- 2. Serious injury or fatality due to road network closure, poisoning or infection.
- Reputational risk to the council if unable to deal with issues.



Controls to Manage Risk (in place)

- The control environment in this area is the Regional Emergency Planning Service (Wrexham, Flintshire, Denbighshire, Conwy, Gwynedd and Anglesey), and local emergency management response groups have been established.
- We also continually review our procedures for winter highways maintenance and flood response. Secondary rota established and operational.
- 3. Service disruption is minimised through our arrangements for business continuity and emergency planning, with separate Directors responsible for Response and Recovery.
- 4. There's an on-call rota in place for CET.
- 5. Emergency Planning Response report taken to Partnerships Scrutiny in June 2015.
- 6. Vulnerable people mapping tool is in operation.
- New chairs for the Communications and Operational Response Groups have strengthened arrangements.
- GOld & Silver training in place for new representatives.
- 9. Deputies for Chairs of response teams appointed.
- Trial business continuity exercise took place in DCC in October 2017. Overall the exercise was successful.



Further Actions

00077 SLT to agree core staff that should have access to buildings in a crisis situation

Action Due Date

Person Responsible

Lead Member(s)

Active

Risk Owner

30/06/2018

Graham Boase

Cllr Richard Mainon

Yes

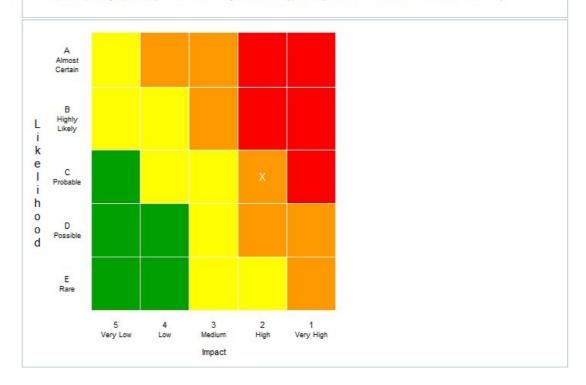
Graham Boase

00012 The risk of a significantly negative report(s) from external regulator

Impact / Consequences

- Reputational damage.
- 2. Potential intervention by the WG.
- 3. Significant resources may be required to be diverted to deliver immediate and substantial change.
- Regulation we're subject to includes: CSSIW (Care and Social serices Inspectorate Wales); WAO
 Office; Estyn; HSE (Health & Safety Executive); ICO (Information Commissioner's Office)

Inherent Risk



Controls to Manage Risk (in place)

- 1. The corporate performance management framework (PMF) is the main control in this area.
- Head of Business Improvement & Modernisation, Strategic Planning Team Manager and Head of Audit meet monthly with Wales Audit Office to understand and respond to their concerns.
- 3. Regulators sit on Service Performance Challenges.
- Reserch & Intelligence team creates Needs & Demands, and Comparative reports to support service self assessment and Service Performance Challenges.
- 5. Annual Governance Statement and Performance Self Assessment now combined.
- Protocol developed for addressing recommendations from WAO national studies: services' response will be the subject of performance scrutiny and service challenge.

Residual Risk



Further Actions

Lead Member(s)

Active

Risk Owner

Councillor Hugh Evans

Yes

Graham Boase

00013 The risk of significant liabilities resulting from alternative models of service deliver

Description

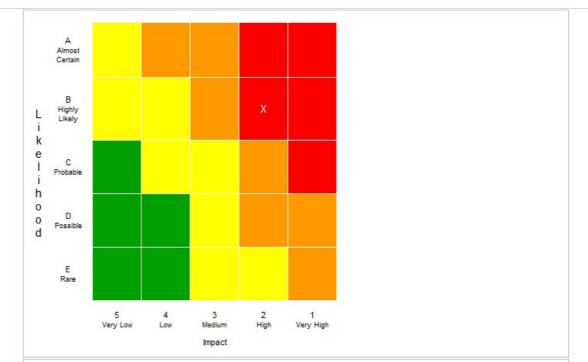
Impact / Consequences

Liabilities could arise due to financial, HR, safeguarding, or general management problems and could impact on the sustainability of service provision

- 1. Financial liabilities.
- Property Liabilities.
- Reduction in levels of service provided to the community, or increased revenue costs to continue delivery.
- 4. Reputation damage to the council

 Portfolio
 CRR
 Corporate Risk Register
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Inherent Risk



Controls to Manage Risk (in place)

- Council is entitled to representation on Boards, and Heads of Service providing strategic advice to facilities.
- 2. Heads of Service advise DCC on any emerging issues and risks.
- Financial support and/or subsidies being provided.
- 4. Processes are in place to manage relationships between DCC and Arm's Length organisations.
- Intervention measures are excercised by DCC if relationships with Arm's Length organisations are difficult to manage.
- 6. Resources have been committed to improve financial monitoring of facilities and services

Residual Risk



Further Actions

Lead Member(s)

Active

TBC Yes

Updates

21/06/2017

Risk Owner Mohammed Mehmet

00014. The risk of a health & safety incident resulting in serious injury or the loss of life. (Where H&S is referred to this incorporates fire safety)

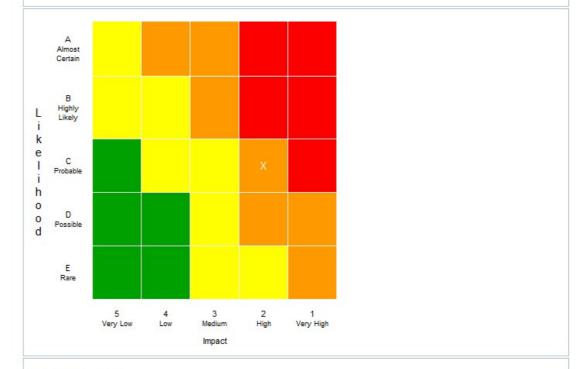
Description

Impact / Consequences

Inherent Risk

This could be as a result of unsafe acts, unsafe work places or ineffective H&S management.

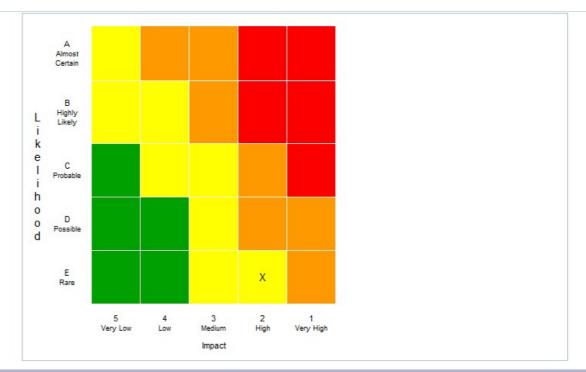
- 1. Serious injury or death of an employee and/or any other person.
- 2. Significant reputational damage
- Substantial legal/litigation costs.
- 4. Criminal prosecution of staff or the organisation.



Controls to Manage Risk (in place)

Updated Feb 2018

- 1. Strategic leadership provided by a Head of Service with delegated responsibility for Health and Safety.
- Competent H&S advisors are employed by the organisation to provide support, guidance and training on H&S.
- A Corporate Health and Safety Policy is in place which defines the H&S organisation and arrangements in DCC
- 4. There is an established H&S Management System in place.
- An established Corporate H&S Committee is in place which is a forum for the employer and employee representatives to discuss and consult on H&S.
- A number of service level H&S committees meet to provide a forum for service managers and employee representatives to discuss and consult on H&S.
- 7. A H&S training program focussed on DCC activities and the way we manage H&S in DCC.
- 8. "Managing safely in Denbighshire" training is mandatory for all managers.
- 9. Health & Safety forms part of the service challenge process through self-assessment
- 10. The corporate H&S team carry out a program of targeted monitoring
- An online accident, incident reporting process is in place. There is an expectation that all accidents and incidents are reported
- 12. Significant H&S related accidents and incidents are investigated internally



Further Actions

Lead Member(s)

Active

Risk Owner

Councillor Julian Thompson-Hill

Yes

Graham Boase

00016 The risk that the impact of welfare reform (Universal Credit) is more significant than anticipated by the council

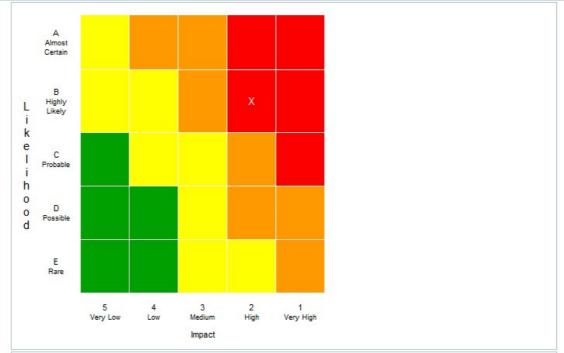
Description

Welfare reform (Universal Credit) has potentially significant implications for a large proportion of residents, and also on the council in terms of increased demand for services and reduced income.

Impact / Consequences

- Potential increase in demand for services: e.g. homelessness and homlessness prevention services; housing (especially for stock which is currently scarce); benefits support / advice, etc.
- Reduced income from rents and council tax payments with reduced cash flow and an increase in bad debt for the authority.
- We expect to see a significant increase in the number of customers requiring digital support from our Library / One Stop Shop Service.
- 4. Also an impact to Social Services due to Disability Living Allowance changes.
- 5. This could also impact on our ability to deliver our Corporate Priorities

Inherent Risk

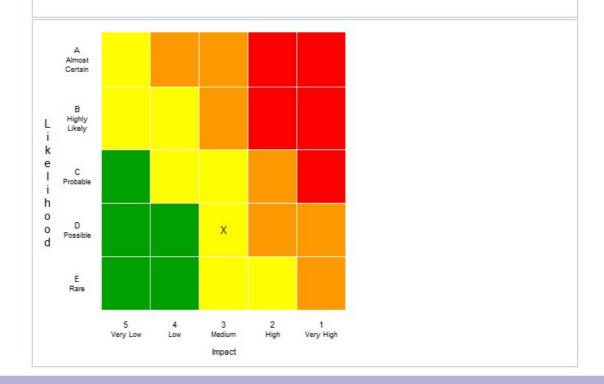


Controls to Manage Risk (in place)

A Cross-Authority / Multi Service Universal Credit Board has been established and is working to address as far as possible the risks and issues associated with the impact of Universal Credit.

The Board have developed a Risk Register and Activity Plan to cover all strategic and operational risks as a result of Universal Credit, these include detailed Actions and Controls with owners assigned to each risk. This register is reviewed on a frequent basis and updates provided at each Board meeting.

Residual Risk



Further Actions

Lead Member(s)

Active

Risk Owner

Councillor Mark Young

Yes

Richard Weigh

0018 The risk that programme and project benefits are not fully realised

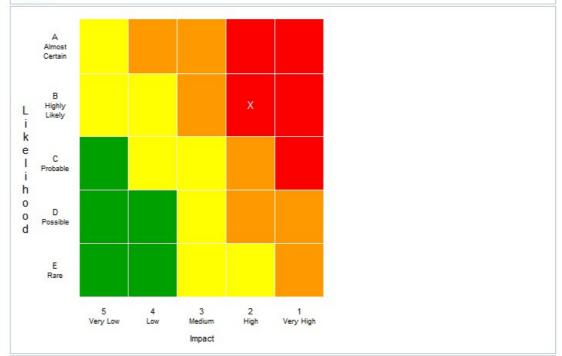
Description

The council currently does not consistently deliver all benefits from projects. Some of the issues include: inconsistent management; resistance to change; staff behaviour and processes not changing as planned. Programmes to be mindful of include: Corproate Plan programme boards, Digital Futures, Reshaping the Council Budget.

Impact / Consequences

Inherent Risk

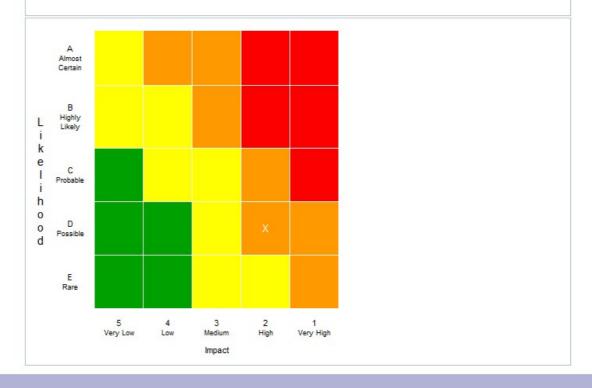
The forecast changes that were alluded to in business cases do not materialise and, hence, neither do their benefits



Controls to Manage Risk (in place)

- 1. Corporate Programme Office established.
- 2. Leadership Strategy in place
- Strategic Planning team will support the Boards, and also support performance management in the organisation, therefore there's a strong alignment between 'change' and BAU.
- 4. Use of Verto to record benefit tracking.
- 5. Change toolkits, together with factsheets, are on the intranet to support managers.
- 6. Finance remove savings from budgets to ensure financial savings are delivered.
- 7. Denbighshire Way Change Management Guidance has been developed
- 8. CET reviews key projects every three months.
- New Corproate Plan Programme Boards chaired by Corporate Directors, who have attended Prog Mgt training.

Residual Risk



Further Actions

Lead Member(s)

Active

Risk Owner

Cllr Julian Thompson-Hill

Yes

Mohammed Mehmet

00021 The risk that effective partnerships and interfaces between BCU Health Board and Denbighshire County Council (DCC) do not develop, leading to significant misalignment between the strategic and operational direction of BCU and DCC

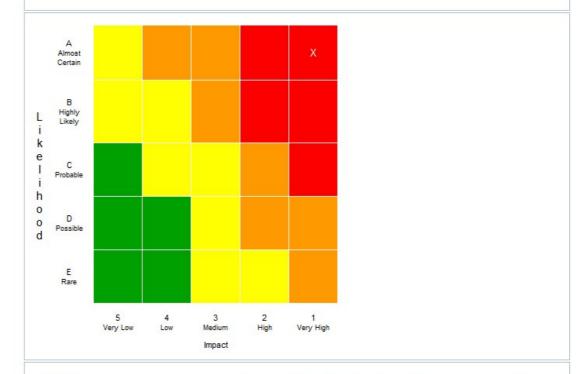
Description

Impact / Consequences

With BCUHB in special measures there is increased political and regulatory scrutiny. This is resource intensive and further detracts from effective partnership working.

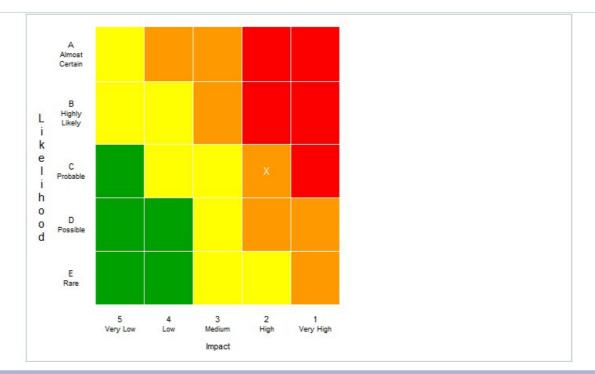
- 1. Inefficient services
- 2. Gaps in service provision
- 3. Delays/failure to deliver joint projects
- 4. Reputational damage
- Ability to meet statutory duties Wellbeing of Future Generations Bill, Social Services and Wellbeing Act

Inherent Risk



Controls to Manage Risk (in place)

- DCC presence in Key meetings and Boards looking at implementing integrated new approaches although there is a notable lack of progress on the integration agenda
- Denbighshire Joint Locality Forum established.
- Nicola Stubbins appointed Associate Member of BCUHB Board
- 4. NWWSIC has reviewed its governance arrangements in partnership with BCUHB.
- 5. BCUHB Area Director in place.
- 6. Locality Structure has bedded in.
- 7. Implementation of the new Regional Partnership Board to progress cooperation and integration.
- BCUHB Area Director chairs the Conwy/Denbighshire PSB, which will have shared priorities and a shared governance vision.



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Further Actions

Lead Member(s)

Active

Risk Owner

Councillor Bobby Feeley

Yes

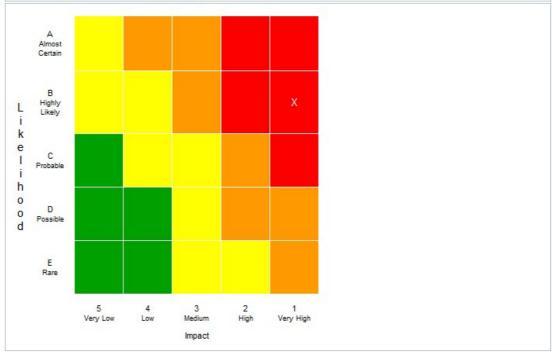
Nicola Stubbins

00027 The risk that the decisions that are necessary to enable the delivery of a balanced budget are not taken or implemented quickly enough

Description

Impact / Consequences Inherent Risk As our settlement reduces, we need to develop and gain approval for plans as to where to stop spending in our budget. Any plans require the approval of Council, and must be implemented in a timely manner that complies with legislation. While the budget process has been successful to date there are still substantial future savings to be made by the Local Authority and the political environment remains sensitive.





Controls to Manage Risk (in place)

- The budget setting process involves Members, so they understand that difficult decisions are necessary, and they are involved with developing the proposals. This should make them more likely to support the recommendations made.
- 2. As decisions are becoming harder then lead in times are becoming longer.
- Services have delivered savings earlier than budgeted which has created a short-term financial cushion.
- 4. The Shaping the Council's Budget board has been established, which is likely to make some controversial suggestions that will require political support. Therefore there may be increased risk of not achieving approval for the service changes required to deliver a balanced budget.

Residual Risk



Further Actions

Lead Member(s)

Active

Risk Owner

Cllr Hugh Evans

Yes

Mohammed Mehmet

00028 . The risk that the changes we introduce have a greater positive or negative impact than we anticipate

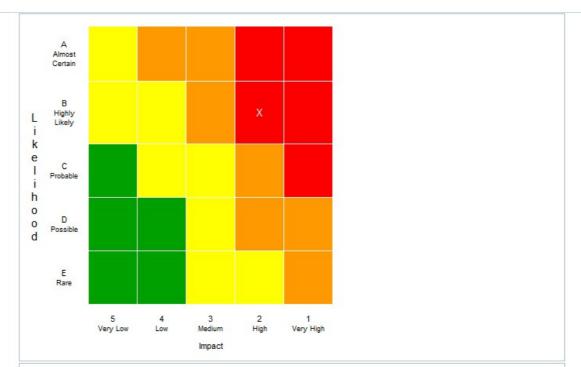
Description

Impact / Consequences

When deciding where to make changes, we endeavour to ensure the quality of key services. There is a risk that we haven't identified the correct services as being 'key', and/or that the changes we make are more disruptive than we anticipated

- Services that are important for our residents are no longer available
- 2. Performance in important areas of our business (for our residents) deteriorates
- 3. Reinstatement/correction in performance is difficult and slow to achieve
- 4. Reputation can suffer if performance deteriorates
- 5. Reputation can suffer if messages are not managed

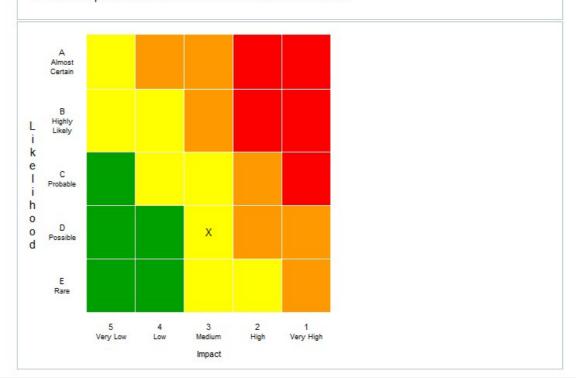
Inherent Risk



Controls to Manage Risk (in place)

- 1. Impact Assessments are undertaken and part of cover reports for decisions
- 2. Cover reports for all decisions ask for risks to be articulated

Residual Risk



Further Actions

Lead Member(s)

Active

Risk Owner

Cllr Hugh Evans

Yes

Mohammed Mehmet

00029 Risk of successful challenge that we are illegally depriving people of their libert

Description

There is the potential for future legal challenges following the recent Supreme Court ruling on deprivation of liberty. The court ruled that all people who lack the capacity to make decisions about their care and residence and, under the responsibility of the state, are subject to continuous supervision and control and lack the option to leave their care setting are deprived of their liberty. The ruling overturned previous judgements that had defined deprivation of liberty more restrictively. This means that many people are likely to have been deprived of their liberty unlawfully and without safeguards in settings including care homes and supported living placements. This is likely to result in a significant increase in DOLS case numbers regarding care home placements, and also applications to the Court of Protection to authorise deprivations of liberty in supported living. We are already beginning to see the impact of the ruling in Denbighshire.

 Portfolio
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Impact / Consequences

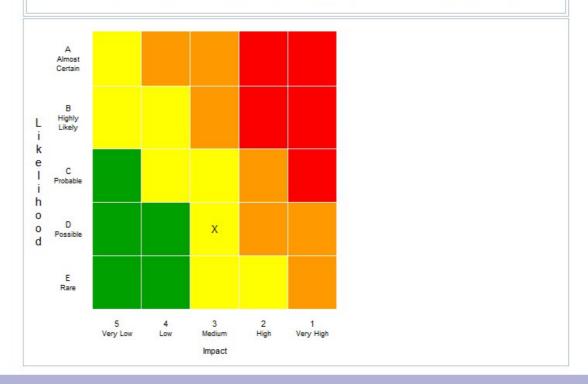
Inherent Risk



Controls to Manage Risk (in place)

- 1 Every provider has received a letter describing our pragmatic approach
- 2 Additional staff members have been trained as Best Interest Assessors
- 3 Increased signatory capacity is reducing backlogs following assessment
- 4 New Senior Practitioner in post for DOLS who will manage the process offering support and supervision

Residual Risk



Further Actions

Lead Member(s)

Active

Risk Owner

Bobby Feeley
Yes
Nicola Stubbins

00030 The risk that appropriate capacity and skills to sustain service and corporate performance is not available

Description

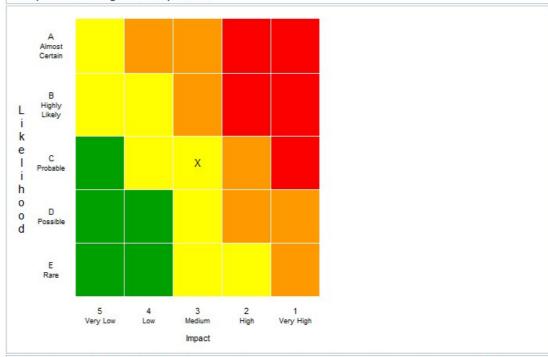
Impact / Consequences

Inherent Risk

The current structure of the Senior Leadership Team has been built on the strength and experience of current postholders. As the number of posts at CET and SLT has reduced there is a concentration of key roles that are critical to the successful delivery of services, and the organisation's ability to respond to policy and legislation. There is a risk that individuals with particular skill sets would be difficult to replace, and there is also a risk that the organisation is not flexible enough to keep up with the pace of change required in light of new corporate priorities and future budget pressures.

Reputational damage Declining performance

Poor performance against new priorities



Controls to Manage Risk (in place)

- 1. Greater opportunities for Middle Managers to 'act up' to key posts in order to gain experience at a more senior level
- 2. Appointment of more senior Middle Managers
- 3. Leadership Strategy is in place
- 4. Heads of Service are tested on their succession plans through Service Challenge
- 5. Quarterly Leadership Conferences held to develop middle managers.
- 6. Training Needs Analysis for SLT & Middle Managers is now complete, with an emphasis on leadership now being led through the DCC Leadership Conferences.
- HoS encouraged to rethink their service plans against context of new corporate plan, budget decisions, and any new legislation, etc.

Certain В i k e I Probable i h 0 0 Χ d Е 1 Very High 3 Very Low

Residual Risk

Further Actions

Impact

Lead Member(s)

Active

Portfolio

Risk Owner

Hugh Evans
Yes

Description

Denbighshire County Council (the Council) employs around 4,500 staff and spends in excess of £300 million per year. It commissions and provides a wide range of services to individuals and households and works with a wide range of private, public and voluntary sector organisations. As with any other large organisation, the size and nature of the Council's services mean that there is an ongoing risk of loss due to fraud and corruption from both internal and external sources. There is also an ongoing risk of bribery as the Council provides and procures goods, works and services.

The Council recognises that as well as causing financial loss, fraud is also detrimental to the provision of services, and damaging to the reputation of, and confidence in, the Council and public bodies in general.

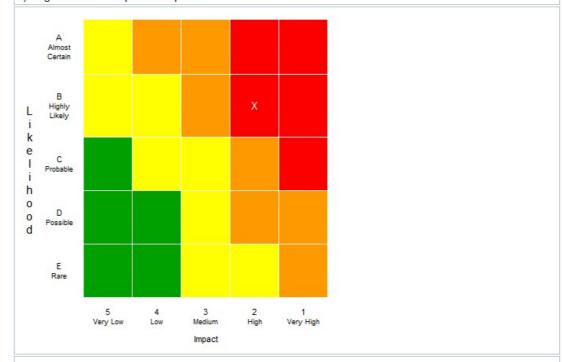
Impact / Consequences

1) Financial loss

Mohammed Mehmet

- 2) Loss of reputation and confidence in the Council and public bodies in general
- 3) Negative impact on service provision / delivery
- 4) Legal / compensation costs
- 5) Criminal prosecution
- 6) Negative audit / inspection reports

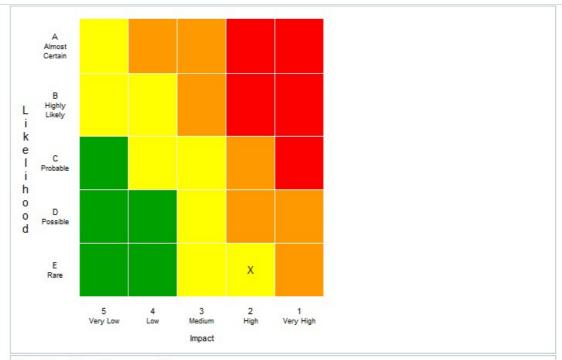
Inherent Risk



Controls to Manage Risk (in place)

In its policies and procedures the Council gives out the clear message that it will not tolerate any impropriety by employees, elected Members or third party organisations. It has put in place arrangement and proportionate systems to minimise this risk and these are kept under constant review, including:

- · The Code of Corporate Governance
- · The Code of Conduct for Elected Members
- · The Employees' Code of Conduct
- Financial Regulations including Contract Procedure Rules
- · The Whistleblowing Policy
- · The Anti-Money Laundering Policy
- · Recognition and monitoring of the risk of fraud in service risk registers
- Systems of internal control
- Recruitment processes
- Regular internal and external review of our systems and procedures
- · Review of Council's anti-Fraud arrangements against the CIPFA Standard 2016 (checklist)



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Lead Member(s)

Active

Risk Owner

Councillor Julian Thompson-Hill

Yes

Mohammed Mehmet

00033 The risk that the cost of care is outstripping the Council's resource

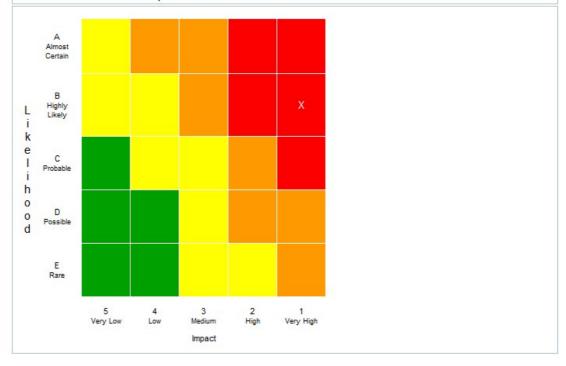
Description

Impact / Consequences

Inherent Risk

Since the Whittleston Judgement and its implementation as well as the increase in the national living wage, the cost of purchasing care has increased by 5% for 2016/17 and is projected to increase by 4% per year for the next four years; largely due to care home fees.

Overspends in Social Care place significant budget pressures on the Council and could result in the scaling back or withdrawal of non-statutory services.



Controls to Manage Risk (in place)

Demand needs to be managed in order to maintain current levels of expenditure. The following controls are currently being embedded:

- . A focus on prevention and early intervention so people don't need to go into care.
- Third Sector grant programme.
- Talking Points.
- Community Navigators.
- Supporting Independence Strategy.
- Being innovative and maximising use of grant monies.
- New approach to supporting people to achieving outcomes.
- Improved partnership working with BCU and integrated assessment as well as managing continuing health care.

Residual Risk



Further Actions

00074 Revision of Domiciliary Care contracts to build in the requirement of providers to work in a more outcome focused way and re-able people

Action Due Date

31/12/2017

00075 Development of additional extra care housing (subject to agreement by Cabinet) by our Housing Association partners

Action Due Date

01/04/2020 Bobby Feeley

Lead Member(s)

Active

Yes

Risk Owner

Nicola Stubbins

00034 The risk that demand for specialist care cannot be met locally

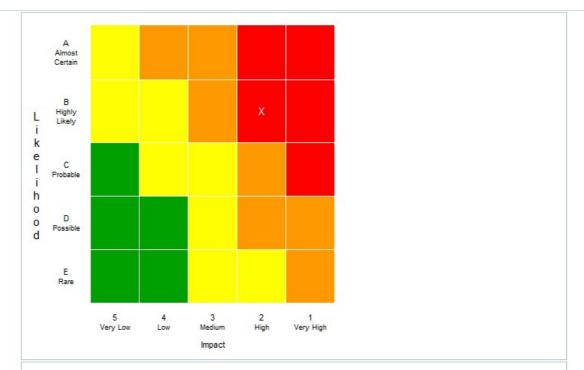
Description

Availability of some specialist adult and child places can be scarce, leading to the requirement to provide expensive services that aren't available locally. Reduction in availability of domiciliary care provision meaning they are unable to provide services needed (particulalry in the South of the county)

Impact / Consequences

- 1. High cost
- 2. Individuals with eligible needs unable to recieve suitable domiciliary care due to lack of resources and service provision
- 2. If far from home there is a deprimental impact on a client's well-being (and that of their family)
- 3. Unable to meet need in preferred language

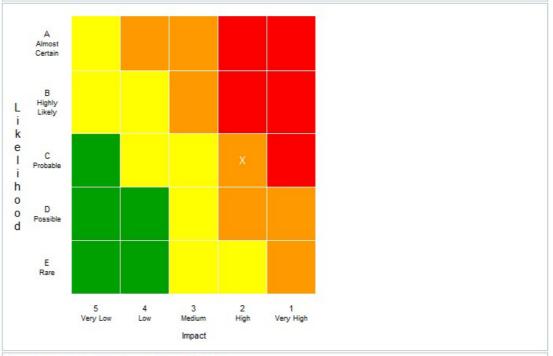
Inherent Risk



Controls to Manage Risk (in place)

- Single Point of Access now fully established and proving successful in providing advice and information to individuals in order for them to access community services themselves.
- Community Led Conversations 'What Matter's' project changing the way staff support individuals
 enabling them to take control of their own wellbeing and utilising other external resources where
 possible.
- Developing a range of staff skill mixes through workforce development in order to enable staff to work in new ways that complement the new government agenda.
- · Series of meetings with providers across CSS underway to negotiate increasing fees.
- · Review and re-assessment project to ensuer individuals are still eligible under new criteria
- · Further development of support budgets
- · Recruitment fayres taken place in county to highlight the need for specific health and social care staff.
- · CSSIW national review of domiciliary care implementing recommendations.
- Regional project considering issues.
- Recommissioning domiciliary care project in progress this includes the implementation of the new regional domiciliary care framework in Denbighshire to include patch based commissioning for difficult rural areas.
- New care team in CSS South Locality (reablers providing longer term support whilst identifying appropriate agency)

Residual Risk



Lead Member(s)

Active

Cllr Bobby Feeley, Cllr Huw Hilditch-Roberts

Yes

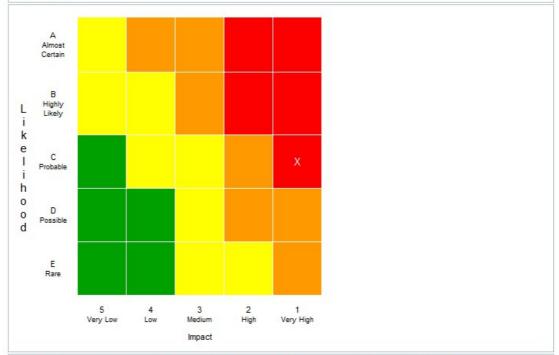
Risk Owner Nicola Stubbins

00035 The risk that the return on invesment that Denbighshire receives from the Regional Growth Deal is disproportiona

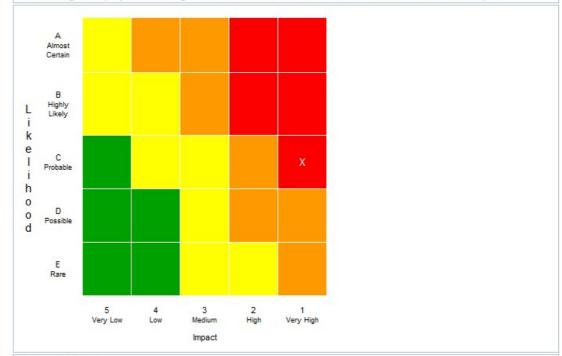
Description

Inherent Risk

The regional growth deal offers opportunity to develop DCC's economy, and there is a risk that there is insufficient engagement to capitalise on these opportunities. Conversely, with the benefits not being clear at present, there is a risk that DCC puts in a lot of effort but doesn't receive a proportionate return on investment.



Controls to Manage Risk (in place) Residual Risk The Strategic Employment Manager contributes to the workstream that's concerned with People.



Lead Member(s)

Active

Risk Owner

Cllr Hugh Evans

Yes

Graham Boase