

APPENDIX 1

CORPORATE RISK REGISTER

This register summarises the Councils most significant risk. It sets out controls in place and identifies any further action needed to mitigate risks. Actions are assigned to appropriate officers with target dates for implementation.

Level of risk: Likelihood vs. Impact on a scale of 1 (lowest) to 4 (highest)

Content reviewed February 2018 by the Internal Audit Manager

PREVIOUS RAG (SEP)	CURRENT RAG (MAR)	RISK / CONSEQUENCES	LIKELIHOOD OF RISK	IMPACT OF RISK	LEVEL OF RISK (to evaluate)	CONTROLS	OUTSTANDING ACTIONS	RISK OWNERSHIP	TARGET DATE	PROGRESS /REASONS WHERE NOT IMPLEMENTED
		1. Health and Safety failing resulting in death or serious injury to staff /public and legal action against the Council	2	4	4	Policies and SHE (Safety Health and Environment) system . The Health and Safety Policy went to Cabinet for adoption on the 21 June 2017. The Health and Safety, Insurance and Risk Administrator manages the SHE Database, overseen by the Health and Safety, Insurance and Risk Manager. The Spelthorne Safety Management system is built on the IOSH Managing Safety course syllabus and terminology. Managers have a legal requirement to conduct regular risk assessments. Induction training. Annual reminders have been introduced to encourage all employees to complete/update health and safety risk assessments (DSE, Homeworking, and Service). The SHE system is being used to ensure that automatic reminders are set for completion and renewal of risk assessments. From January 2018, annual health and Safety checklist, activity and compliance programme for Managers.Champions for Health and Safety have been identified in each Service area to implement the necessary actions. Personal Safety Training provided and Lone Worker protection process being pursued in collaboration with 'Peoplesafe'. Safety Champions designated for each Service. Health and Safety at Work Regulations have been circulated for Managers attention. Training sessions are in place through the Council's IOSH training provision and Group Heads, Managers and Team Leaders are being encouraged for Champions to attend.	<i>1i. Recommendations raised in an Internal Audit review of January 2017 are being pursued . There is scope to tighten up controls relating to training, procedures and the 2017 Management activity/compliance programme 1ii. The inspection process across the authority needs to be made more robust - regular inspections to be carried out and consistently documented to ensure evidence is available. 1iii A project is due to be undertaken to enhance the efficiency of the SHE system (health and safety management). (NEW)</i>	HSIRM/ SEHM/ MAT/ All Group Heads *	31 May 2018 *R Requires Monitoring	1i. Partially Implemented . The Managers and Team Leaders Guide to Health and Safety will (once completed) include instructions for the use of SHE (Health and Safety Management system). The Health and Safety Officer is also in the process of arranging training sessions for all staff on the use of SHE. It is envisaged that the newly recruited Health and Safety Resource will support the team by documenting and developing Health and Safety Procedures further. 1ii. Partially Implemented . The robustness of inspections to be periodically discussed at the Corporate Risk Management Group, enabling feedback from relevant officers. Recent appointment of a dedicated Health and Safety Officer within Neighbourhood Services to oversee issues arising at the Depot.
		2. Uncertainty surrounding the financial /economic/other consequences of contaminated land. Legal action against the Council.	2	4	4	Legal duty to inspect land and prioritise action. Documented records of all site investigations and assessments held. A separate risk assessment is held which is reviewed regularly. Contaminated land risk assessment was reviewed in September 2017, with the next review due in 2019 , or sooner if need be. Reports periodically issued to Management Team and Cabinet. The revised contaminated land strategy went to Cabinet for adoption in June 2017.Case Law of July 2017 reduced the liability for local authorities in respect of Part 2a Contaminated Land.	NONE	SEHM*	Completed/ Ongoing Monitoring	N/A
		3. Disaster- major in borough, e.g flooding, resulting in significant strain on council services	2	4	4	Contract agreement in place with Applied Resilience, with increased resilience and support for Emergency Planning. Corporate Emergency Plan updated January 2016. Multi- agency flood plan completed December 2015 and reviewed January 2018. Function being delivered via the Mutual Applied Resilience Service. Membership of Local Resilience Forum (LRF). Regular testing of Emergency Assistance Centre plan. Borough Emergency Centre Plans.Improvements made to the Business Emergency Centre (BEC) by ICT. Incident management training and exercising. The two DCX's have attended Multi-Agency Gold Command Courses. Emergency Response requirements remain the responsibility of the authority. Prevent Strategy training provided to front line officers as well as an awareness briefing to all staff (March 2017).	<i>3i. Monitoring the agreement with Applied Resilience should incorporate specific targets and expected outcomes in order to measure actual performance. Monitoring needs to be meaningful and clearly evidenced. 3ii. A Borough Emergency Centre Exercise will be taking place providing an opportunity to test plans.</i>	CX (RT)/ GH C & T*	Completed/ Ongoing Monitoring	3i. Implemented and monitoring continues to be undertaken by the Group Head for Commissioning and Transformation. 3ii. Implemented . During 2017 Applied Resilience have undertaken a series of Borough Emergency Centre training sessions for staff to increase preparedness for an incident. The latest exercise took place in October 17. Staff feedback is being considered in any updates to the Borough Emergency Centre (BEC) plan and equipment.
		4. Failure to manage corporate and service performance / failure to meet Council objectives and targets (Performance Management)	2	3	3	The Corporate Plan sets out targets for the authority which should be monitored by Members and Management Team. Service performance should be monitored by Management Team. Individual performance should be monitored through the appraisal process. Flagship project performance is reported to Management Team and Members. Performance Management Working Group has been established to improve monitoring arrangements. Revised Corporate Plan approved and publicised. Recommendations highlighted in an internal audit review of October 2016 addressed for the 2017/18 Service Planning process.	NONE	MAT / DCX LO/GH C & T	Completed/ Ongoing Monitoring	See also risk category 5 below. As part of the 2018/19 Service planning process, plans for completion due to be issued March 18 and annual performance reviews to be completed April 2018.

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		5. Failure to align service objectives to corporate aims and priorities / Failure to deliver services effectively due to poor service planning	2	3	3	The Corporate Planning process should set out a clear vision for the authority and specific targets. Some services have statutory responsibilities. Individual Service Plans should be derived from the Council's Corporate Plan and statutory/other responsibilities. Plans incorporate resources, risks, workforce, significant projects and performance indicators. The majority of Service Plans for 2017/18 have been completed and placed on Spelnet.	5i. Service Planning for 2018/19 is due to be undertaken. (NEW)	Group Heads/ MAT / DCX LO/GH C & T	30 April 2018 *R Requires Monitoring	See also risk category 4 above.
		6. Failure of projects due to poor project management arrangements. Lack of resource and expertise to deliver and coordinate asset related/other projects whilst continuing to maintain services.	2	3	3	1. Project management arrangements are in place including processes for project initiation, consideration of resources available to deliver, identification of project risks and progress reporting processes. Corporate Project Register updated as necessary. Corporate Project team is in place. The Council's Management Team ensures project documentation is completed, resource implications assessed and agreed control processes adhered to. Priority Flagship project performance is reported to Management Team on a weekly basis. On a quarterly basis a report goes to MAT, Cabinet Briefing and Overview and Scrutiny committee outlining progress made with projects and the work of the corporate project team.	6.1 i Management team to consider limited capacity and revenue implications prior to approving additional / new projects. 6.1ii. The new Procurement Officer to promote the importance of following correct procurement processes in delivering projects.	MAT	Ongoing monitoring	6.1i. Ongoing . Approx. 35 projects are currently being tracked through the Project Office and TaSF programme. Resourcing of projects remains an ongoing challenge as officers are often balancing several work tasks. 6.1 ii. Implemented . The Procurement Officer has been focussing on procurement in the projects process. Revised draft Procurement Strategy and Action Plan.
		See Above 6				2. Staines upon Thames - The Group Head for Regeneration and Growth oversees Staines upon Thames regeneration with support from consultants. 5 work streams have been fully defined and documented.	6.2. A number of options are being considered for the Bridge Street site.	GH R & G *	31 May 2018 *R Requires monitoring	Considering a number of options for development of this site, and the adjoining Hanover House which was acquired in November 2017 and becomes vacant end of September 2018.
		See Above 6				3. Towards a Sustainable Future - The programme for this challenging initiative identifies roles, responsibilities, key deadlines, financial implications and risks. There are three work streams/mini programmes falling under the overall TaSF programme. MAT have assigned resources to the main areas of the TaSF programme, and projects are underway. The Group Head for Commissioning and Transformation currently oversees the direction of the programme.	6.3. High level overview of the three work streams has been identified to ensure cohesion and coordination. Scope to ensure this is periodically considered.	MAT	31 May 2018 *R Requires monitoring	Close monitoring of TaSF projects and timeframes is ongoing to manage risks and overall impact of the delays on the programme as a whole. TaSF projects have been completed or ongoing. Project dashboard updates to Management Team. Asset acquisitions and development projects now reviewed on a weekly basis by Management Team
		7a(i). Information Governance risks relating to organisational measures. Non compliance with data protection legislation. Information could be processed inappropriately resulting in breaches of the DP legislation, Information Commissioner fines and reputational damage. Loss of public confidence.	4	4	4	Mandatory data protection online training. Information Governance Group. Information Governance Officer is in post to provide ongoing guidance and ensure compliance with statutory obligations. Information Governance Officer completed a GDPR Practitioner Course and achieved a distinction. Introductory training for GDPR has been provided to staff which identified the implications of the GDPR (whereby regulators can impose a significant increase in fines up to £20m or 4% of global revenue turnover) and advised what actions staff needed to take (at a high level). Information Governance structure agreed by MAT and made available on Spelnet; this identifies the SIRO and lines of responsibility for Information Assets. FOI requests: A process map has been developed and distributed to assist staff with FOI requests and to reduce the likelihood of releasing information inappropriately. In Nov and Dec 2017 staff improved their timeliness for responding to FOI requests such that 90% of requests were responded to within the 20 working days deadline.	7i. Information Governance Group to pursue action plan to ensure information assets are identified and managed. 7ii. Raise awareness of Information Governance and the requirements of the DP legislation amongst staff and members. Identification of detailed training requirements in services. 7iii. Information flows to be mapped and Information Asset Owners to be identified. 7iv. Management Team have requested periodical progress reports on preparedness for the GDPR (Legislation effective from May 2018). (NEW) 7v. Implement mandatory FOI training and raise awareness of Public Sector Information Regulations.	GH C & T */IGO *	1 July 2018* R Requires Monitoring	7i. Partially implemented - The Information Governance Officer has produced a detailed work plan to work towards GDPR compliance by May 18. There is a lot of work to be done in many Service Lines. 7ii. Implemented: There is now an Information Governance area available on Spelnet. Overview training on GDPR has been delivered to staff and a session was arranged for Councillors at Full Council (Feb 18). In house training for staff continues as requested by services; supplemented by external training. 7iii. Ongoing and represents a large piece of work. 7v. Partially implemented; there is now an online FOI module available, a process map for FOI has been agreed by MAT and circulated to staff. FOI has been given a lower priority than data protection due to GDPR. The Information Governance Officer advises on FOI requests as requested. The Feb 2017 version of the Local Public Services Data Handling Guidelines is available on Spelnet. Risk rating increased due to separation of organisation and technical measures (see 7a .ii below)

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		7a(ii) Information Governance risks relating to technological measures. Security breaches resulting in system failure, non compliance with various information legislation which might lead to Information Commissioner fines/enforcement and reputational damage. Loss of public confidence.	2	4	3	Data Back up and continuity arrangements managed by ICT and tested by Managers. ICT security policies. Personal Commitment statement required from staff on appointment. ICT security group assess ongoing risks. Series of Security Awareness updates conducted in October 2017 for all staff. Information Governance Group. Information Governance Officer in post. Further ICT Disaster Recovery test conducted in November 2017 (successful).	NONE	GH C & T*/Head of ICT*	Completed/Ongoing Monitoring	N/A
		7b. See above 7a.				Document Retention Policy held. The authority has decided on its approach to document management and implemented the first phase.	7iii. <i>Electronic document management systems (EDMS) project is due to be completed by December 2017, which is intended to help strengthen information security.</i> 7iv. <i>The Document Retention Policy is being revisited in relation to back scanning of Building Control and Disabled Facilities Grants .</i>	GH C & T*/IGO* MAT	31 May 2018 R* Requires Monitoring	7iii. Partially Implemented. EDMS is progressing. The Idox document management system has been implemented for Environmental Health, Planning and Building Control with training delivered. Progress is ongoing for Building Control and Environmental Health and requirements for Planning almost complete. Close working with Customer Services currently. Analysis work underway to identify requirements to expand Civica Contact Manager additional modules to accommodate other service areas (HR, Housing,Leisure). For internal Documents the plan is to upgrade and rebrand SharePoint, although sufficient resourcing is required to progress this.
		8. Failure to meet the minimum security requirements of the Government Code of Connection resulting in termination of connection to any other government sites/data; uncertainty over direction of ICT; unavailability of ICT systems; fraud eg unauthorised removal	2	3	3	A review group assesses compliance with the Government Code of Connection (CoCo). Firewall installed, laptops encrypted, black-listing of memory stick,CD's and DVD'S, and universal serial bus (USB) ports locked down. Dual factor authentication on all laptops. All Baseline Personnel Security Standard checks completed. Annual health check and security penetration test . The Cabinet Office has increased security requirements due to the implementation of the Public Service Network (PSN) which has superseded CoCo . Successful certification of the Public Service Network (PSN) compliance until March 2018, with the reaccreditation process due imminently . Mimecast e-mail filtering software installed June 2016 to help reduce infected and problematic e-mails entering the Council's network. Disaster Recovery plan for ICT developed alongside Applied Resilience. National Cyber Security Strategy.	8. i. <i>Production, approval and implementation of an ICT Strategy consistent with the core objectives of the Council, ensuring effective and efficient use of resources and service delivery.</i> 8ii. <i>Internal Audit review scheduled for 2017 of measures being taken to protect the authority from Cyber Security threats and adequacy of the authority's response to any such attacks.</i> 8iii. <i>A network refresh is overdue and MAT are encouraging the need for flexible solutions.</i> 8iv. <i>The annual health check and security penetration test are currently being carried out (February 18), with ICT addressing any critical and high risk</i>	Head of ICT*	31 May 2018 R* Requires monitoring	8i. Implemented - The ICT strategy identified a requirement for a Business Analyst post, which has been addressed. Further to the original ICT Strategy document , an additional management summary has been produced in February 2018 highlighting project updates. 8ii. Implemented - An Internal Audit Review of Cyber Security has been completed. Recommendations taken on board including appointment of a Network manager. 8iii. Implemented. Network refresh undertaken.

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		9. Lack of business continuity planning to cover loss of building, equipment, ICT or staff - leading to loss or disruption to services	2	3	3	Business Continuity (BC) Policy updated .The BC Forum oversees progress of BC planning. Business Impact Assessments identify priority services, resources required for their continuation and time frame. Emergency protocols for loss of building access/loss of power/loss of ICT are being developed. Emergency messaging system for staff. Improvements made to telephony resilience. Contract agreement in place with Applied Resilience , with increased resilience and support for Business Continuity Planning. Updated staff contacts list. Issues arising from the corporate table top exercise of September 2016 have been fed into the Corporate Business Continuity Operational Plan. The updated Corporate Business Continuity Plan now forms two plans so it is more meaningful for the key responders (Incident Management Team and recovery team).	<p>9i. Monitoring the agreement with Applied Resilience (by Spelthorne) should incorporate specific targets and expected outcomes in order to measure actual performance. Monitoring needs to be meaningful and clearly evidenced.</p> <p>9ii. Applied Resilience to issue a final deadline regarding the outstanding service-level continuity plans.</p> <p>9iii. Management Team are keen to undertake a fire evacuation procedure combined with a scenario where re-entering the building is not possible. (NEW)</p> <p>9iv. Management Team have highlighted that bomb awareness procedures require updating (NEW)</p>	GH C & T*	31 May 2018 R* Requires monitoring	9i. Ongoing Implemented - Applied Resilience have collated updated Service-Level Plans (SLP) and pursued any previous outstanding plans .
		10. Failure in service delivery due to over reliance on individuals; loss of technical systems knowledge and expertise; staff morale issues and stress levels.	3	3	3	Group Heads/MAT are responsible for ensuring business continuity, including loss of key staff. Critical procedures should be documented and staff appropriately trained. Group Heads should review as part of the service planning process. Resilience may be provided from other local authorities or other organisations. Relevant training has been provided for Group Heads and Deputies based on development needs. Human Resources have identified further training for Managers on Practical Workplace Mediation Skills and Mental Health Awareness for Employers, with courses scheduled for March/April 2018. Significant investment has been built into the 2017-18 Budget to address resourcing, retention and morale issues These include moving back to a local pay award likely to mean an additional 1% for staff, building in £200k for market supplements, additional resourcing for key delivery areas of Legal and Asset Management. A number of new appointments are underway.	NONE	Group Heads/MAT/GH C & T* /	Completed/Ongoing Monitoring	Group Head for Commissioning and Transformation provided a general update of this area to the October 2017 Audit Committee.
		11. Failure in service delivery due to reduced capacity and increasing demands from the community; high staff turnover; prolonged staff vacancies due to inability to recruit; Increased risk of delay, errors or stress.	3	4	4	Short term reductions in capacity are accommodated by prioritisation and reallocating work amongst staff. Longer term impacts and changes to demand may be more difficult to address. If resources cannot be enhanced, services will have to prioritise work. Staff have access to counselling via Occupational Health. Posts advertised with Surrey Jobs which also feeds into a wider network of job sites. Specialist websites are also used to advertise posts. Annual report by Human Resources issued to Management Team summarising staff recruitment and turnover. Following a review of recruitment and retention in 2016 , market supplements awarded to certain roles and increased investment allocated to certain Services. Recruitment and retention allowances. Briefing sessions have been held to raise awareness amongst Managers about the national apprenticeship scheme.	<p>11i. Members and Management Team will need to keep resourcing levels under review, particularly the impact of new projects and any statutory obligations on service/project delivery.</p> <p>11ii. Implementation of requirements relating to the national apprenticeship scheme.</p> <p>11iii. Human Resources to monitor the effectiveness of measures taken to improve recruitment and retention across the authority , in collaboration with Services.</p>	Group Heads/MAT/HRM	31 May 2018 R* Requires monitoring	11i. Ongoing Partially Implemented - A decision was made by Management Team that the Apprenticeship Levy would be spent on upskilling internal employees mainly. There will be some recruitment of new apprenticeships under the levy, and progress is being made. 11iii. Ongoing . Management Team have agreed to extend current recruitment and retention allowances for a further year. Group Head for Commissioning and Transformation will be providing a further update to the March 2018 Audit Committee to advise on the latest position .

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		12. Low morale as a result of increasing service demand, lack of staff & finance, organisational restructure. Increased turnover, high staff stress levels, risk of losing expertise and impact on services.	2	3	3	Employment arrangements in place include recruitment and selection, pay and rewards, training and development. Change Management process, communications, performance management systems, appraisals, one to one's, team meetings, performance clinics, staff meetings. Stress audits (risk assessments) can be arranged if necessary. The Human Resources Manager advises MAT as appropriate. See also controls recorded under section 10 above.	12i. Management Team to keep under review.	MAT	Completed/Ongoing monitoring	MAT maintaining under review . Additional budget provision built in to the 2017 - 18 budget for market supplement to assist with recruitment and retention, which is being extended for a further year. Currently on a national pay scheme but are considering a possible move to local pay subject to consultation.
		13. Failure to comply with the Council's corporate governance requirements and standards resulting in poor value for money, Costly legal challenges and reputational damage.	3	3	3	Corporate Plan setting out clear purpose, vision and outcomes. Constitution setting out clearly defined roles/rules for Members/Officers. Code of Corporate Governance and Codes of Conduct to promote high standards of conduct and behaviour. Informed and transparent decision making processes open to scrutiny. Member and staff training programmes. Accountability through published accounts and community engagement . Induction programme delivered for new councillors during 2015 including briefing on roles and responsibilities, financial position, delivering services and current key issues.	13. The Council's Code of Corporate Governance is due for review.	MAT or Head of CG	Completed/Ongoing monitoring	13. Implemented. The code has been updated and is due to be reported to Overview and Scrutiny on 13 March to note, Cabinet on 21 March to approve and recommend to Council who will consider on 26 April 2018.
		14a. Procurement - Weak governance arrangements and lack of transparency. Financial penalties for non-compliance with legislative requirements. Contractual disputes and claims through poor specifications. Weak contract management resulting in Contractors/partners failing to deliver expected outcomes. Reputational damage, challenge and poor VFM	3	3	3	Contract Standing Orders set out tendering requirements, revised in April 2016. Contract guidelines with compliance checklist. Officer Code of Conduct sets out requirement for declaration of interests. Contract management training held in 2012 and 2013. Specification writing training taken place. Procurement training provided in October 2014. E-procurement system in place and contracts sourced with this solution which offers significant time savings and efficiencies for staff in Legal. Procurement strategy and action plan to facilitate monitoring. Developing improved reporting systems and paperwork to streamline the process and encourage further organisational buy-in enabling monitoring of performance and successes more easily. Procurement Officer in post.	14i. Full compliance with the Local Government Transparency Code is required and should be confirmed once achieved. 14ii. To ensure there is an ongoing reference for officers involved in procurement activity, Procurement and Contract Management guidelines need to be updated and publicised to reflect regulatory changes of 2015. 14iii. Implement a programme of training for contract managers where the principles of Contract Standing Orders and Contract Check list form the core element of the learning. 14iv. The future of the Procurement Board to be considered as part of a review of all boards across the authority. 14v. Enhanced monitoring arrangements for key suppliers is being implemented (NEW)	MAT DCX (TC)/ PS/Group Head C & T*	31 May 2018 R * Requires monitoring	Group Head for Commissioning and Transformation and the Procurement Officer will be providing an update to the March 2018 Audit Committee. The updated procurement strategy/action plan is being reported to March Cabinet. A central contract register is being compiled. Specific Actions progress: 14i, 14ii & 14iii . Partially Implemented. Proposed actions are being taken forward and implemented. Compliance with the transparency code is being addressed through the purchase of a procurement and contract management system used by 27 local authorities and continues to be a priority for the Procurement officer. Documentary evidence of procurement processes followed and performance monitoring is recognised as an area for improvement (highlighted in the internal audit review of January 2017) and the Group Head for C & T envisages that with the new Procurement Officer and a service level monitoring officer at the Depot this area should improve over time . 14iv. Partially implemented. A decision as to whether the board continues has been incorporated into the Action Plan.
		14b. Major Contracts - Lack of forward planning in preparation for the expiry of existing Leisure Centre arrangements in 2021, resulting in delays in Service provision. Delays in delivery of project and key milestones.	3	3	3	Leisure centre operator contract ends 2021. A paper entitled "Leisure Centre Needs Analysis" was submitted to MAT in July 2014. This was updated in May 2017 and endorsed the recommendation to carry out a feasibility study to refine options going forward. A high level discussion document was presented to Cabinet in October 2016 and a project team formed to support the future direction of this project. All project related documentation is in place including project plans, outline business case (identifying risks and issues) and highlight reports. A high level and more detailed project plan, milestones and deliverables have also been identified. Project Management is shared between the Joint Head and Deputy Group Head for Community Wellbeing. Councillors have been kept informed of key progress milestones. There is close monitoring of the contractor producing the feasibility study to ensure it provides useful information for decision making, with a report due 22 February 2018 . Although a clear view on how the project will progress will not be apparent until the feasibility study is complete, outline requirements and timeframes are starting to emerge.	14bi The tender for the appointment of specialist advisors to assist with the development of the feasibility study and financial business plan is due to be published by 30th September 2017. 14bii. A final decision on the site for the new leisure centre is under consideration. 14biii. A Cabinet report was submitted in February 2018 requesting delegated authority to commission a design project team to progress to the next stage i.e. a PM, QS, Architect etc. (NEW) 14 iv A risk register is now in place and monitoring underway. (NEW)	Joint Group Heads CW/Deputy Group Head CW *	31 May 2018 R * Requires monitoring	Current completion of the project is estimated mid-2021, based on an assumption that Planning Permission will be granted late 2018. Update received from the Deputy Group Head for Community Wellbeing on the following areas: 14bi Implemented. The tender for specialist advisors was awarded in November 2017 and the feasibility study is due to be presented end Feb 2018. This will form the basis of a Cabinet report in April 2018 outlining the preferred facilities mix and a high level cost plan including capital and revenue expectations. The Cabinet report will request authorisation to proceed with the next phase of the project (design and build). 14bii. Pending. This will be based on an environmental report which has been commissioned by Asset Management.. 14biii. Some Progress. Procurement of a design team to progress the project will be pursued (once agreed by Cabinet). 14iv. Implemented/ Ongoing

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		15. Pressures on Housing Service as a result of economic climate and welfare reforms. Universal Credit may lead to staff retention issues. Loss of Housing Benefit subsidy and uncertainty over recovery of outstanding debt. London Boroughs increased use of Spelthorne properties. Insufficient affordable properties. Housing shortage.	3	3	3	Group Heads/ MAT/Members are aware of risks. Working groups established to deal with changes. The authority faces some challenges in managing the loss of £500k per annum in subsidy (recovery of Housing Benefit overpayments) and the roll out of Universal Credit is now projected for the end of 2018. There is currently £2.85m of outstanding Housing Benefit overpayment debt in the Council's accounts. This is being recovered, albeit repayments are often small due to Housing Benefit regulations. Corporate Debt Group. Cabinet has received updates on Welfare Reforms. This includes a suggested approach to the use of discretionary housing payments. Strategic Housing Group. Officers and A2D have been working with families affected by the benefit cap. Close working with private landlords. Landlord guarantee scheme went live in Sep 2016 with a number of Landlords having signed up. Projects underway to ensure strategies are followed. A model for the strategic way forward in delivering the Housing function is being applied. Knowle Green Estates (subsidiary) set up in May 2016 focusing on Housing Delivery. Despite this the pressures on the frontline Housing Services continue.	<p>15i. Management Team to continue to monitor the ongoing pressures facing the Housing Service (including impact of County Council cuts and statutory changes).</p> <p>15ii. Implementation of legislative changes arising from the Homelessness Reduction Act effective from April 2018 and planning for the likely impact on the Housing team. The new Act places increased duties on local authorities to prevent and relieve homelessness.</p> <p>15iii. A high level internal audit review is currently underway considering the authority's readiness for the homelessness legislative changes. Given that this is a flagship project with full implementation due imminently, Internal Audit are engaging in discussions around the draft findings. (NEW)</p>	MAT / Joint Group Heads CW *	31 May 2018 R * Requires monitoring	15i. Ongoing Some Progress. Key activities include project team meetings, recruitment of new housing options staff (to boost team capacity), an operational sub-group consisting of Housing staff focussing on detailed implementation of the service delivery remodelling, liaison with ICT to explore products and solutions to address significant system changes anticipated. Informal reporting has taken place in the form of the Project Sponsor (Joint Group Head of CW, Deborah Ashman) regularly updating the DCX, TC and the Portfolio Holder for Housing on progress with the Council's preparations. The Housing Manager provided a progress report to the Council's Overview & Scrutiny Committee on 28 November 2017. The Deputy Group Head for C & T is due to complete a Project highlight report.
		16. Poor partnership governance arrangements	3	3	3	MAT set strategic direction for Partnerships. Partnership governance policy out of date (August 2009). Insurance arrangements in place.	<p>16i. A responsible officer to review, update and re-issue the Partnership Governance policy.</p> <p>16ii. Completion of questionnaires to make an assessment of Partnership governance arrangements.</p> <p>16iii. Members of Overview and Scrutiny Committee to scrutinise Partnership activity if required.</p>	Group Head C & T	31 May 2018 R * Requires monitoring	March 2018: There are no further developments to report. The Group Head for C & T issued a report to Management team in July 2017 outlining the intention to implement all of the recommended audit actions highlighted in 2016/17. As a first stage a list of significant partnerships entered into across the authority has been compiled and shared.
		17a. Uncertainty over economic growth and supplier failure, impacting on: <ul style="list-style-type: none"> • Delivery of contracts and services • Business Rate income collected/retained 	2	3	3	Financial Services monitor the financial media in relation to larger companies and critical commercial partners. Enhanced Monitoring arrangements are being implemented (See Procurement risk category 14a above). Aim to maximise collection/minimise losses for the Council. Use Analyse Local software as information source. Additional counter fraud resource has been made available from August 2017 to identify and investigate potential tax avoidance and evasion cases, working to a specification of high risk categories.	<p>17i. Impact of Business Rate arrangements on Council finances is under ongoing review.</p> <p>17ii. Spelthorne will be participating in the 100% retention of business rates pilot for 2018/19 providing further incentive to maximise income collection (NEW)</p>	DCX (TC)/Acting Group Head CR *	31 May 2018 R * Requires monitoring	17i. Implemented and Ongoing Key suppliers now added to the S&P Watchlist to enable concerns to be picked up pro-actively. Additional quarterly monitoring of collection and project outturn retention being discussed between the Surrey Councils to be implemented in time for end of quarter 1 2018-19. See also risk category 26, Corporate Counter Fraud.

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		17b. Economic Development Strategy fails to be implemented impacting on growth				Economic Development Strategy is reviewed every three years. Regular reporting to the Cabinet Member with responsibility for Economic Development to advise on progress with action plans and delivery of the strategy. LGA funded adviser produced 3 reports on Key Account Management, Inward Investment and Visitor Numbers. Funding subsequently approved. A CRM is being developed to track Spelthorne's top 20 businesses with regards to key account management. A permanent post of Business Engagement Officer has now been created (8 May 17) to support inward investment / key account management for 3 days per week. The updated 5 year economic assessment & development strategy for 2017 - 2022 was approved by Cabinet in February 2017. It incorporates recommendations made by Internal Audit in their 2016 review such as formal clarification of responsibilities, establishing timescales for actions in the strategy (wherever possible) to improve accountability, documentary evidence for decision making, enhancing performance review and monitoring mechanisms, and ensuring regular formal Member oversight of the strategy. A Business Improvement District has taken effect for Staines-upon-Thames and charges have been incorporated into annual billing for business rates.	<i>17iv. Economic development is a Council priority and growth will impact on business rate income - this is under ongoing review. 17.v. The updated 5 year economic assessment & development strategy for 2017-2022 and associated processes incorporate recommendations raised by Internal Audit in their review of December 2016. One such recommendation made is that progress on each of the 'actions' in the strategy needs to be regularly monitored by the Economic Development Engagement Group (EDEG) bi-annually. 17vi. Through the EDEG 5 areas have been identified as the most important areas of delivery within the strategy and will be reported on every 6 months to the group to strengthen performance monitoring.</i>	DCX (TC)*/GH R & G*/ EDM*	Completed/Ongoing Monitoring	17iv. Ongoing review. 17v & 17vi - Implemented and Ongoing . Each year the economic development plan will be reviewed and amended as necessary, with targets that have been achieved removed, and new emerging targets included subject to approval from the EDEG. The strategy has been reviewed internally to establish where actions have now been completed. Work is currently underway to identify and prioritise projects which can be funded from the 100% retention of business rates pilot.
		18. Failure to comply with employment legislation or statutory duty leading to possible compensation (unlimited), damage to reputation, Legal costs and significant officer time.	2	3	3	Human Resources (HR) identify changes in employment legislation, provide guidance and training to ensure compliance. Professional HR support. Equality and Diversity working group and training provided to all staff. There is a range of different legislation that Human Resources have to oversee and there is no one set process when implementing change. Where there are possible contractual changes and other implications Human Resources notify managers and examples of this are the IR35 changes and English Language requirement. Measures are taken to ensure policies, procedures and working practices are compliant and incorporate best practice. Human Resources also feed into the SLP training programme to ensure any legislative changes are covered in courses on offer for our staff.		MAT/ Group Heads/ HR Manager *	Completed/Ongoing Monitoring	
		19. Failure to comply with statutory duty / adhere to Safeguarding Policy leading to death or injury to child or vulnerable adult, legal action and reputational damage. Failure by County to address Spelthorne referrals relating to vulnerable children/adults.	2	4	4	Council has statutory responsibility for safeguarding children and Adults. Safeguarding policies and procedures. Staff and Member training. All referrals to Surrey County Council should be reported to a nominated Spelthorne Officer. Regular liaison with the Head of the MASH team. Regular meetings held with Surrey County Council and consultation with the Surrey Safeguarding Children's Board (SSCB). Annual Section 11 audit. The Children's Safeguarding and Adults at Risk Strategies have been revised Feb 2017. The latest Safeguarding Policy was approved by Cabinet in March 2017 and is on Spelnet. The updated referral procedure is displayed on all notice boards. Escalation of any cross border referrals/ issues to the senior safeguarding managers. Liaison with Human Resources to ensure an accurate list is held of staff requiring training and DBS checks. Online safeguarding training module was launched at Spelthorne in December 2016 and cascade training has been provided for Streetscene and Spelride drivers. Measures have been taken to address internal audit recommendations of December 2016.	NONE	DCX (TC)/LSM/ILM/Joint Group Heads - CW *	Completed/ongoing monitoring	March 2018: The team have set up a new procedure to deal with the Multi Agency Safeguarding Hub (MASH) enquiries. Four safeguarding officers receive the enquiry from MASH. One officer deals with the enquiry and then consults with the relevant service areas before reporting back to the MASH. Spelthorne is represented on the new Early Help Advisory Boards by the Deputy Chief Executive, Terry Collier. Officers from various sections are assisting.

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		20. Significant and ongoing reduction in Central Government funding. Opportunities for significant income generation and investments are missed, impacting on the Council's ability to close the budget gap and deliver vital services. Weak governance arrangements may contribute to poor investment outcomes and increase exposure to financial risk; loss of anticipated rental income	3	4	4	Long term strategic/financial planning. Corporate Plan / priorities reviewed. Member engagement 'Towards a Sustainable Future' programme identified potential savings and additional sources of income. The Council is applying innovative ways to fund services and create new revenue streams through commercial asset acquisitions and investments. In September 2016 Spelthorne Borough Council announced the purchase of the campus occupied by BP in Sunbury-on-Thames. BP are tenants at the Sunbury site leasing back the offices from SBC for a minimum of 20 years. This is an example of an investment generating significant income year on year helping the financial sustainability of the Council. Advice is sought from the Treasury Management advisors as appropriate.	20i. Towards a sustainable future programme to be delivered 20ii. Legal agreements such as leases to include relevant clauses in order to safeguard the Council's interests, with monitoring arrangements to follow. 20iii. Robust and effective corporate systems need to be in place to record and recover significant rental income due to SBC. 20iv. A robust governance framework is being developed to support property acquisitions and investment processes	MAT	31 May 2018 R * Requires monitoring	20i. Implemented and Ongoing. As part of Income Generation there have been significant asset acquisitions and Investments during the current and previous financial year. Since September 2016 an additional ongoing annual net income of £7.5m has been generated from commercial asset acquisitions. This has enabled a balance budget to be set for 2018-19 and to make revenue contributions towards capital to put capital programme financing on a more sustainable basis. Investment Asset Strategic Parameters approved by Council in December 2017. Supporting Asset management plan, performance indicators and governance to be in place by financial year end. Officer/councillor (Leader and Finance Portfolio Holder) Investment and Development Property Committee now meeting regularly to evaluate performance and opportunities. 20ii. Implemented/Ongoing. Thorough due diligence always undertaken with respect to leases and acquisitions and with respect to evaluating strength of covenant of tenants- now using S&P to evaluate. 20iii. Some Progress. The newly appointed Property Development Managers within the PDU will be involved in setting up and implementing such systems, in close collaboration with other Services such as Corporate Governance, Customer Services and Finance. The GH for R & G has organised several Process Mapping workshops with a view to assigning roles and responsibilities for the whole process. The resourcing situation within Customer Services needs to be kept under review in light of the fundamental role the corporate debt team will need to play in ensuring effective implementation. 20iv. Implemented/ Ongoing. Governance Framework has been developed and continues, as follows; 1. Asset Governance framework and action plan; 2. Property Investment Strategy; 3. Investment and Property Development Committee; 4. Revised regulatory investment guidance (Feb 18) requires LA'S to develop quantitative indicators that allow Councillors and the public to assess a local authority's total risk exposure as a result of its investment decisions. Planned reporting on these Prudential indicators from March 2018; 5. Presentation by the Portfolio Holder for Finance and DCX (TC) to O & S on the council's approach to management of risk with respect to commercial property acquisitions; 6. Robust Treasury Management Strategy; 7. Weekly update to MAT on status of all Priority Flagship projects(incl. commercial asset acquisitions).
		21. Reduction in service delivery, reduced capacity and possible loss of internal control as a result of savings required to balance budget	3	3	3	Management as the first line of defence are responsible for maintaining key services and internal controls. Reduced resource levels in some areas are likely to impact on the ability to operate an adequate level of controls. For example segregation of duties is not always possible and there may be fewer management checks. In such cases compensating controls are required.	21i. MAT to acknowledge that reduced resources and capacity levels has an impact on the level/adequacy of controls operating within functions/corporate systems and processes. Associated with this is a lower level of assurance.	Group Heads/ MAT	Completed/ongoing monitoring	2017/18 budget has provided additional resources for Housing, Legal and Asset Management. Some key governance roles have also been introduced such as a Procurement Officer and Information Governance Officer. The resourcing situation within Customer Services needs to be kept under review as this is having an impact on the level of controls operating within some systems.

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		22. Changing political landscape - Brexit represents many potential uncertainties for organisations such as currency devaluation/volatility, trade, investments, relocation of Partners/Suppliers, changing access to EU funds, level of compliance with EU regulations , workers rights (EU Nationals), existing policies and procedures, procurement process	3	3	3	At the request of Management Team, a discussion paper setting out potential staffing implications and uncertainties associated with Brexit has been prepared by the Human Resources Manager (March 2017). A verbal update has been provided with regards the potential financial implications, risks and opportunities .	22i. MAT to periodically consider potential Brexit uncertainties for Spelthorne and have a plan in place to address.	MAT	31 May 2018 R * Requires monitoring	March 2018: There are no further developments to report. This area requires ongoing review .
		23. Poor return on long term investments /investments insecure in current climate	2	3	3	Treasury Management Strategy approved annually by Members. Aim to select counter parties of the highest credit quality; credit ratings monitored closely. Council's investments managed internally in consultation with Arlingclose. Quarterly meetings and conference calls held with Arlingclose. Deputy Chief Executive, Terry Collier and Portfolio Holder, Councillor Williams are involved in key decisions. Use a range of credit ratings and criteria recommended by Arlingclose. Regular monitoring ,reporting of investment portfolio and returns achieved.	NONE	DCX (TC) *	Ongoing monitoring	March 2018: Annual Treasury Management Strategy and Capital Programme and Strategy for 2018-19 both approved by Council 22nd February 2018. A new Chief Accountant and Deputy Chief Accountant are in post to oversee the Finance team including the Treasury Management role. The team continues to explore options for diversifying the portfolio. As well as investments the Council now has considerable debt (fixed rate) as a result of the recent asset acquisitions. The portfolio continues to deliver good rates of return - on core pooled funds achieved average rate of return of 5.18%. CIPFA Code of Practice and Prudential Code being applied with new recommended indicators for measuring investment performance.
		24. Failure to collect/recover income due, resulting in losses to the authority.	3	3	3	Corporate Debt Officer Group reconvened. This forum is used to monitor the more material items on the aged debt analysis and also coordinate action to tackle debt that is unlikely to be recovered. The DCX, Terry Collier, as S151 Officer, receives and reviews a monthly status report of higher value aged debts over 6 months old in order to confirm that suitable recovery action has been taken, and where exhausted, ensuring write- off action is pursued. Corporate Recovery Policy held. Recovery policies also exist for specific areas such as Council Tax, NNR, Sundry Debts etc. Debt collection statistics produced and analysed. Budget Monitoring identifies any shortfall in income. Accountancy report to Management Team and Members on significant variances and comparisons with previous year. Debt recovery training for relevant staff has been provided.	24i. The terms of reference for the Corporate Debt Group require review. Outstanding internal audit recommendations can be monitored and progressed through this group, in particular actions relating to the monitoring and recovery of outstanding aged debt and the governance of the recovery process. 24ii. The sundry debt recovery policy is being reviewed with a view to speeding up the recovery timetable process. 24iii. In order to improve efficiency, there is scope for Customer Services to take greater control over the persual of all sundry debts.	MAT/ DCX, TC/AGH CR/ Group Heads	31 May 2018 * R Requires Monitoring	24i. Implemented and ongoing. A review of the terms of reference for the Corporate Debt Group has been carried out which includes reference to the Group's remit in monitoring outstanding internal audit recommendations. A progress review of audit recommendations is being discussed at the March Corporate Debt Group meeting. 24ii. Progress/status being reviewed at the March Corporate Debt Group meeting . 24iii. Progress/status being reviewed at the March Corporate Debt Group meeting .
		25. Serious and organised crime poses a threat to national security; lack of awareness may lead to harm to the local community or staff; intelligence is not shared or acted upon; organised crime groups could be benefitting from public sector procurement contracts resulting in financial or reputational losses	3	4	4	The Internal Audit Manager is Spelthorne's Single Point of Contact for Serious and Organised crime. There has been liaison with the local Police team to identify high risk areas generally and specifically for Spelthorne. Discussion of framework to be applied for the Serious and Organised Crime Audit .	25i. Serious and Organised Crime Audit to be carried out in accordance with the official Police framework. This is intended to identify areas where Spelthorne is most vulnerable/ at risk . 25ii. Group Heads and Managers to assess governance arrangements currently in place to help combat the risk of serious and organised crime.	IAM/ Group Heads/MAT	31 May 2018 * R Requires Monitoring	25i. Some Progress - Representatives of the local Police team with specific expertise in this field will be raising general awareness of this topic with Group Heads and relevant Managers at an organised session on 28.3.18. This briefing is intended to compliment the audit review by giving managers an early opportunity to consider potential vulnerabilities in their respective areas. Separate Cyber Security Audit completed in 2017/18 (see risk category 8 above - note Cyber crime is an example of serious and organised crime as it can result in significant harm arising from substantial financial gain for the criminal/financial loss for the organisation). 25ii. This action will be taken forward as part of the planned audit, in collaboration with Group Heads and Managers.

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		26. Increased risk of fraud / theft due to economic climate resulting in financial losses and damage to reputation of authority. Housing tenancy fraud reduces availability of social housing. Business Rates Avoidance and Evasion results in loss of income	3	3	3	Corporate Policies including Confidential Reporting Code (Whistle blowing), Anti-fraud, Bribery and Corruption Strategy, Proceeds of Crime and Anti-Money Laundering, Code of Conduct including rules relating to gifts and hospitality, and declaration of interest. Staff are reminded about governance policies during the appraisal process. Refresher fraud and anti-bribery awareness training for staff and Members is due. Various policies and procedures such as Financial Regulations and Contract Standing Orders, management checks, segregation of duties, reconciliation processes for financial systems and IT Security measures. An internal fraud referral process/system has been implemented within Housing . Audit Services and Investigating Officers continue to attend specialist Fraud groups with Surrey Partners which are very useful forums for sharing skills, knowledge and approaches to tackling fraud/ business rate avoidance/evasion cases. Internal Fraud Overview meetings also held to disseminate high level issues. Fraud alerts and relevant reports are circulated. Additional Corporate Counter Fraud resource procured from Reigate and Banstead Council, in accordance with a pre-defined specification. This contractual arrangement is monitored by the Internal Audit Manager including consideration of financial payback.	26i. Monitor financial payback from Counter Fraud work. 26ii. To arrange Fraud and anti-bribery and corruption training for all staff and Members.	Group Heads/ MAT/IAM	31 May 2018 * R Requires Monitoring	26i. Implemented/Ongoing. Counter fraud work continues with non-benefit fraud returns being collated quarterly, focusing on housing and business rates (evasion and avoidance). At 31.12.17 the cumulative return for Spelthorne (since the start of the Surrey Fraud Partnership in January 2015) exceeds £1m. Collaborative working with Reigate and Banstead's Counter Fraud team has produced positive outcomes particularly in Housing with the introduction of enhanced verification checks for new claims. A joint report prepared by the Acting Group Head for Customer Relations and Internal Audit Manager was issued to Overview and Scrutiny Committee on 16.1.18 highlighting measures being taken by Spelthorne to address business rates tax avoidance and evasion, along with further initiatives to explore. 26ii. Some Progress. Effective methods for delivery of Corporate Fraud , anti-bribery and corruption awareness training (for all staff and Members) are being explored with possible scope for shared training through the Surrey Counter Fraud Board .

***KEY TO RAG RATING**

***KEY TO TARGET DATES**

- Actions overdue and outstanding
- Partially actioned
- Completed/Ongoing monitoring

- * O = Original target date for assigned action
- * R = Revised target date for assigned action
- * N = New Action

Note that previous RAG ratings are included to illustrate the Direction of Travel for recommended actions

***KEY TO OFFICERS**

- MAT - Management Team
- AGH CR - Acting Group Head for Customer Relations, Roy Tilbury
- Head of CG – Head of Corporate Governance, Michael Graham
- Head of ICT – Helen Dunn
- DCX (TC) – Terry Collier
- HSIRM - Health and Safety, Insurance and Risk Manager – Stuart Mann
- GH C & T - Group Head - Commissioning and Transformation, Sandy Muirhead
- GH - NS - Group Head - Neighbourhood Services- Jackie Taylor
- DCX (LO) – Lee O’Neil
- SEHM - Senior Environmental Health Manager, Tracey Wilmott-French
- PS - Principal Solicitor, Victoria Statham

- GH R & G - Group Head - Regeneration and Growth, Heather Morgan
- IGO - Information Governance Officer, Clare Williams
- HRM – Human Resources Manager, Debbie O’Sullivan
- CM- Contract Managers
- Joint Group Heads of CW – Joint Group Heads for Community Wellbeing, Deborah Ashman and Karen Sinclair
- LSM - Leisure Services Manager, Lisa Stonehouse
- RRO – Risk and Resilience Officer, Nick Moon
- EDM – Economic Development Manager, Keith McGroary
- IAM - Internal Audit Manager, Punita Talwar