

	A	B	C	D	E	F	G	H	I	J	K
1			APPENDIX 1					<u>CORPORATE RISK REGISTER</u>			
2	This register summarises the Council's most significant risks which align to one or more Corporate Priority. It sets out controls in place and identifies any further action needed to mitigate risks . Act										
3	Actions are assigned to appropriate officers with target dates for implementation. The relevant Portfolio Holder for each risk category is also highlighted.										
4											
5	Level of risk: Likelihood vs. Impact on a scale of 1 (lowest) to 4 (highest)							Content reviewed July 2019 by the Internal Audit Manager			
6	March	July									
7	PREVIOUS RAG	CURRENT RAG	RISK / IMPACT (WITH REFERENCE TO CORPORATE PRIORITY)	LIKELIHOOD OF RISK	IMPACT OF RISK	LEVEL OF RISK (to evaluate)	CONTROLS	OUTSTANDING ACTIONS	RISK OWNERSHIP	TARGET DATE	PROGRESS /REASONS WHERE NOT IMPLEMENTED
8			1. If Health and Safety fails it could result in death or serious injury to staff /public and legal action against the Council, with associated reputational damage (CLEAN & SAFE ENVIRONMENT)	2	4	4	Approved Health and Safety Policy. Health and Safety Plan. Health and Safety at Work Regulations. SHE (Safety Health and Environment) system with dedicated training . Health, Safety and Insurance Risk Manager. Dedicated Health and Safety Officer in Neighbourhood Services. Managers have a legal requirement to conduct regular risk assessments. Staff Induction training. Annual reminders to complete/update health and safety risk assessments (DSE, Homeworking, and Service). Annual Health and Safety checklist, activity and compliance programme for Managers. Health and Safety Champions and meetings. Personal Safety Training and Lone Worker protection process. IOSH training provision and Champions encouraged to attend. Dedicated training available for First Aiders, Fire Wardens and Marshals. The robustness of inspections and site monitoring is periodically discussed at the Corporate Risk Management Group.	1i. There is scope to tighten up controls relating to training, procedures and the Management activity/compliance programme 1ii. The inspection process across the authority needs to made more robust - regular inspections/site monitoring 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). 1iv. The Corporate Risk Management Group will continue to provide an opportunity for Managers to raise any issues of concern regarding Health and Safety (NEW) 1v. Additional corporate health and safety resources for both SBC and KGE have been approved and are being taken forward (NEW)	HSIRM/ SEHM/ MAT/ All Group Heads * Cllr Boughtflower	31 October 2019 *R Requires Monitoring	1i. Partially Implemented & Progressing. Further documentation and development of Health and Safety Procedures is ongoing. 1ii. Partially Implemented & Progressing . The monthly Health and Safety Committee is now attended by most service areas, however, some services are regularly absent. Going forward an attendance register will be taken. Work has been undertaken to address the shortfalls in the inspection process with ongoing improvements in health and safety monitoring, however, further improvements are still required.The restructure of the parks team is nearing completion and greater control measures for supervision and inspection of this area are currently being developed. 1iii. Commenced. Changes have been made to SHE to make it more user friendly, additional measures are planned. A number of SHE user guidance notes have been written, available to all service areas. Additional guidance notes will be developed. Systems for health and safety monitoring, along with auditing and review are to be developed and implemented. Risk Assessments are being made more readily accessible.
9			2. If there was a major Disaster in the borough, e.g. flooding, this may result in significant strain on council services (CLEAN & SAFE ENVIRONMENT)	2	4	4	Performance monitoring by Commissioning and Transformation. Emergency Planning support. Corporate Emergency Plan has been Updated and a public version placed on the Council's website.. Multi- agency flood plan reviewed January 2018. Membership of Local Resilience Forum (LRF). Regular testing of Emergency Assistance Centre plan. Borough Emergency Centre (BEC) Plans and staff training in 2017 & 2019. Staff feedback considered in updates to (BEC) plan and equipment. Incident management and Multi-Agency training. Prevent Strategy training and awareness (March 2017).	NONE	CX (DM)/ GH C & T* Cllr Harman	Completed/ Ongoing Monitoring	Applied Resilience have delivered a number of BECC (Borough Emergency Control Centre) training sessions for SBC staff during May and June 2019.
10			3i. If performance at corporate and service level is not effectively managed then the authority could fail to deliver priorities, objectives and targets. 3ii. If there is failure to align service objectives to corporate priorities and objectives this could result in services not meeting residents /stakeholder needs. (ALL PRIORITIES)	2	3	3	Corporate Planning process incorporates a vision, priorities and targets. Monitoring by Members and Management Team. Service Planning and review process. Individual Service Plans should consider the Council's Corporate Priorities and statutory/other responsibilities (this is in the guidance). Service performance monitored by Management Team. Individual performance monitored through 1 to 1's and the appraisal process. Appraisal timetable. Priority Flagship project performance is reported regularly to Management Team and Members. Corporate Annual Report is reported to Cabinet.	3i. Quarterly reporting and monitoring of Service Plan implementation. 3ii. Improved alignment between Service Plans and the Corporate Plan as well as the budgetary cycle is planned . 3iii. A new Corporate Plan will be prepared. (NEW)	MAT / DCX LO/GH C & T /Group Heads & Managers * Cllr Boughtflower	i. 30 September 2019 * R Requires Monitoring ii. Early 2020 * R Requires monitoring	3i & 3ii Proposals for more frequent reporting and monitoring of progress in implementing service plans for 2019/20 have been communicated to Group Heads and Managers in February 2019, as have further planned developments to the service planning process. There are no further updates to communicate in this area . The Corporate Annual Report for 2018/19 has been prepared, to be reported to Cabinet in July 2019.

	A	B	C	D	E	F	G	H	I	J	K
	PREVIOUS RAG	CURRENT RAG	RISK / IMPACT REFERENCE TO CORPORATE PRIORITY)	LIKELIHOOD OF RISK	IMPACT OF RISK	LEVEL OF RISK (to evaluate)	CONTROLS	OUTSTANDING ACTIONS	RISK OWNERSHIP	TARGET DATE	PROGRESS /REASONS WHERE NOT IMPLEMENTED
7											
11			4. If there are inadequate project management arrangements (including lack of resources and relevant expertise or skills), then outcomes are unlikely to meet community/ service needs or projects fail to be delivered on time/ to budget. If projects do not incorporate sufficient governance standards, then this could result in poor decision making and unclear justification for actions, resulting in potential challenge (ALL PRIORITIES)	2	3	3	Project governance framework/methodology. Corporate Project Register updated as necessary. Corporate Project resource is in place but ownership for ensuring that project documentation is completed, resource implications assessed and necessary control processes are applied rests with Project Managers and Sponsors. Priority Flagship project performance is reported weekly to Management Team and includes asset acquisitions and development projects. 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.	4 i Management team to consider limited capacity and revenue implications prior to approving additional / new projects. (Ongoing) 4ii . Whilst the Council has a proportionate project governance framework, consistent and proportionate application of project governance arrangements are required to contribute to the likely success of projects whilst reducing potential risks of delays and overspend. Effective governance should incorporate the necessary structures and processes to support key decisions and approvals, promote the need for robust plans, monitor progress against pre-determined plans and milestones, and include regular effective reporting to Management Team and Members. 4iii. An internal audit review of Project Governance is currently underway.	MAT/GH C&T /Group Heads* Cllr Boughtflover	30 September 2019 * R Requires Monitoring	4i. Ongoing. Resourcing of projects remains an ongoing challenge as officers are often balancing several work tasks. Through the root and branch review of Services, the Commissioning and Transformation team will continue to identify projects and resources required but also improve processes and systems to assist the organisation's capacity and resilience. This also links in with risk categories 8 & 9 below. (There are no further developments to report) 4ii. In Progress. This issue and relevant improvement actions have been highlighted again as part of the recent internal audit review of Project Governance. (See point 4iii below) 4iii. Completed & Ongoing. The internal audit review of Project Governance arrangements has been completed (May 2019) and Management are addressing the improvement actions/audit recommendations raised to enhance control processes/governance(links with point 4ii above) A revised document template has been circulated incorporating several control stages such as Project Initiation, key considerations, and a business case. This will be a requirement for every project and the Project Steering Group will have visibility.
12			5a. 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, reputational damage. and loss of public confidence. Potential to breach Freedom of Information (FOI) Act resulting in disclosure of personal data or commercial sensitive data, and ICO enforcement. (ALL PRIORITIES)	4	4	4	Mandatory data protection online training on a yearly basis. In house (more specific) training for staff continues as requested by services; supplemented by external training. Member training. Data Protection Officer (trained and experienced) provides ongoing guidance on the Data Protection Act (2018), and the Privacy and Electronic Communications Regulations. Information Governance structure agreed by MAT and made available on Spelnet; this identifies the Senior Information Risk Owner (SIRO) and lines of responsibility for Information Assets. Data protection compliance plan for services agreed by MAT+ and distributed to Group Heads and Managers to progress data protection compliance within service lines. Training of identified Information Asset Owners ongoing. An Internal Audit review of GDPR preparedness was undertaken in April 2018 and many improvement actions have been taken forward. FOI requests: FOI online training and guidelines, FOI process flowchart.	5i. Data Protection Officer to pursue plan to ensure information assets are identified and managed. 5ii. Raise awareness of Information Governance and the requirements of the DP legislation amongst staff and members. Train remaining Information Asset Owners. 5iii. Information flows to be mapped 5iv. Completion of information assets registers for all Information Assets. 5v. Group Heads to ensure that the Data protection compliance plan for services is followed to progress compliance within service lines. This plan includes identification of information assets and data mapping (relates also to 5i & 5iii above).	GH C & T */IGO * All Portfolio Holders	30 September 2019 * R Requires Monitoring	5i. Implemented & Ongoing : The Data Protection Officer has produced a detailed work plan to work towards GDPR compliance. This has fed into the data protection compliance plan for services (issued Autumn 2018) - see 5v. 5ii. Implemented & Ongoing : The level of data protection awareness in the Council continues to increase. The former temporary administrator helped move forward completion of many of the Information Asset Registers. Due to the volume of work short term resource is currently in place. A total of 78 staff members have been trained with a further 28 still to attend training delivered by the Data Protection Officer. 5iii. In Progress - Process flows are being mapped as part of the Route & Branch review being undertaken by the Projects team which will significantly assist with mapping data flow. See also response to 5v below. 5iv & v . In Progress- Deadlines in the data protection compliance plan for services have not been achieved in many areas.
13			5b Information Governance risks relating to technological measures. If security breaches occurred this may cause system failure, non compliance with various information legislation which might lead to Information Commissioner fines/enforcement and reputational damage, with loss of public confidence. (ALL PRIORITIES)	2	4	3	Data Back up and continuity arrangements managed by ICT and tested by Managers. ICT security policies and security alerts. 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 and a representative from the Cyber Crime Unit raised specific awareness of Cyber crime in July 2018 (mandatory session). Desktop video training rolled out to all staff from June 2019. Information Governance Officer in post. Annual ICT Disaster Recovery test.	5b i. A Disaster Recovery test (ICT) is scheduled for September 2019 and any issues arising will require addressing. (NEW)	GH C & T*/DHICT * Cllr Boughtflover	30 September 2019 * O Requires Monitoring	5b. General - Video training has been rolled out to all staff to raise awareness around data security.

	A	B	C	D	E	F	G	H	I	J	K
	PREVIOUS RAG	CURRENT RAG	RISK / IMPACT (WITH REFERENCE TO CORPORATE PRIORITY)	LIKELIHOOD OF RISK	IMPACT OF RISK	LEVEL OF RISK (to evaluate)	CONTROLS	OUTSTANDING ACTIONS	RISK OWNERSHIP	TARGET DATE	PROGRESS /REASONS WHERE NOT IMPLEMENTED
7											
14			6. Failure to meet the minimum security requirements of the Government's Public service Network resulting in termination of connection to any other government sites/data; unavailability of ICT systems impacts service provision; unauthorised creation & amendment of records for fraudulent purposes; inadequate measures to combat cyber security attacks or respond effectively resulting in reputational damage and financial losses (ALL PRIORITIES)	2	3	3	National Cyber Security Strategy. A review group assesses compliance with security requirements - Public Service Network (PSN). Successful certification of the Public Service Network (PSN) compliance. Self-assessment for PCI (Card Industry Data Security Standard) submitted in February 2019 and are compliant. Security measures include firewalls, encryption, egress, 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. Mimecast e-mail filtering software in place. Disaster Recovery plan for ICT developed alongside Applied Resilience. ICT Strategy being developed to support the core objectives of the Council. Network refresh undertaken. System Administrators are currently assigned for each key application system, with privileged access rights to undertake relevant duties. Independent review of the ICT function/resources undertaken in 2018. Telephony review underway considering remote devices.	6i. As System Administrators also have operational and processing roles within the associated service area, this lack of segregation of duties (between operations and administration) increases associated risks of fraud or error. This is a longstanding issue which requires periodical review by Management Team. 6ii. An ICT Audit Needs Assessment is currently underway to highlight risks for further consideration in the audit planning process. 6iii. Following the recent annual health check and ICT Security penetration test any risks highlighted are being addressed. (NEW)	DHICT *Cllr Boughtflower	6i & 6ii Completed/ Ongoing Monitoring 6iii (NEW) 30 September 2019 R * Requires Monitoring	6i. Ongoing Monitoring - Given that the risks to achieving full segregation of duties in this area prevail Internal Audit have continued to highlight the importance of applying compensating controls within service areas. Independent management review of system generated exception reports has been promoted as well as other controls. 6ii. Completed - The ICT Audit Needs Assessment has been completed (April 2019) in collaboration with Management and a planned programme of ICT audit work for the next three years has been agreed, focussing on areas of highest risk .
15			7. Ineffective business continuity planning to cover loss of building, equipment, ICT or staff could lead to loss of service or disruption in a real scenario (CLEAN & SAFE ENVIRONMENT)	2	3	3	New contract in place from September 2018 for ongoing provision of Business Continuity Planning support . Performance monitoring by Commissioning and Transformation. Business Continuity (BC) Policy . Corporate Business Continuity Plan and Service Level plans with periodical review. The BC Forum oversees progress of BC planning. Business Impact Assessments . Service level business continuity plans are being reviewed and updated Emergency protocols for loss of building access/loss of power/loss of ICT are being developed. Emergency messaging system for staff. Telephony resilience. Key responders - Incident Management Team and recovery team. Security policy updated and Applied Resilience have a text messaging system which will alert staff and instruct on whether to leave or stay where they are.	7i. Management Team are keen to undertake a fire evacuation procedure combined with a scenario where re-entering the building is not possible.	GH C & T*	30 September 2019 R * Requires monitoring	7i. Outstanding . Previously advised that Applied Resilience are organising an exercise for late Spring 2019. At July 2019 no further developments have been reported in this area.
16			8. If there is over reliance on individual officers then in the event of absence or departure this may cause a gap in technical/systems knowledge and expertise, with subsequent failings in delivery of functions/ services (ALL PRIORITIES)	3	3	3	Business continuity arrangements to cover loss of key staff. Critical procedures should be documented and staff appropriately trained. Any weaknesses in resilience arrangements should be highlighted in the service planning process. In some larger service areas greater resilience is being built into teams with some individuals taking on a variety of roles. (An example of this is the Project Officer/Committee Manager within the Commissioning and Transformation team)	8i. Management Team to keep resilience arrangements under review. 8ii. Root and Branch service reviews are underway giving consideration to resilience, resourcing and capacity.	MAT/ Group Heads/ GH C & T * All Portfolio Holders	30 December 2019 R * Requires monitoring	8i. Ongoing Monitoring . Resilience is one of the issues being considered as part of the root and branch service reviews. 8ii. In progress - Developments on Root and Branch reviews including efficiencies identified are communicated at corporate staff meetings and via Spelnet.
17			9. If increased service demands coincide with a lack of staff resources/capacity to deliver then this may result in reduced morale, high staff stress levels with possible impact on staff mental and physical wellbeing, delays and errors, increased sickness and turnover , with subsequent failings in delivery of services (ALL PRIORITIES)	2	3	3	Short term reductions in capacity are accommodated by prioritisation and reallocating work . Longer term impacts and changes to demand may be more difficult to address. Employment arrangements and staff support mechanisms. Market supplements/allowances to assist with recruitment and retention. Training and development. Performance management systems, (appraisals, one to one's). Regular staff meetings. Stress audits (risk assessments) can be arranged if necessary. Human Resources reporting to MAT. Significant investment was built into the 2017-18, 2018-19 & 2019-20 budget to address resourcing for some service areas (such as HR, Legal, Independent Living, Environmental Health). Strategic Management Team have committed to supporting mental health wellbeing and training to raise awareness of mental health has been delivered for a number of Managers in June 2019.	9i. Management Team will need to keep resourcing levels under review, particularly the impact of new projects and any statutory obligations on service/project delivery. (Ongoing monitoring action) 9ii See action at 8ii above relating to Root and Branch reviews.	MAT *Cllr Boughtflower	30 December 2019 R * Requires monitoring	9i. Completed/Ongoing Monitoring . Additional staffing resource approved for some Service areas in 2019/20. Since March 2016 73.19 posts have been added to the Council's establishment list and so there has been increased resources, even after allowing for the transfer of the grounds maintenance operation back in-house. This has helped improve resilience and Spelthorne have been able to do so as a result of additional commercial asset income. 9ii. In Progress - Root and branch review of services is underway in order to identify efficiencies and capacity issues which can be resolved to improve organisational performance and resilience. Some quick wins have been achieved.

	A	B	C	D	E	F	G	H	I	J	K
	PREVIOUS RAG	CURRENT RAG	RISK / IMPACT REFERENCE TO CORPORATE PRIORITY)	LIKELIHOOD OF RISK	IMPACT OF RISK	LEVEL OF RISK (to evaluate)	CONTROLS	OUTSTANDING ACTIONS	RISK OWNERSHIP	TARGET DATE	PROGRESS /REASONS WHERE NOT IMPLEMENTED
7											
18			10. If there are prolonged staff vacancies due to inability to recruit, then this may result in a failure in service delivery (ALL PRIORITIES)	3	4	4	Market supplements awarded to certain roles when recruiting. Annual review of recruitment and retention allowances. review/enhancements in some services. Posts advertised with Surrey Jobs as well as a wider network of job sites. Specialist websites are also used to advertise posts where necessary. Annual report summarising staff recruitment and turnover. National apprenticeship scheme. Levy to be focussed on upskilling internal employees as well as some recruitment of new apprenticeships. Local arrangements in place for deciding pay awards and moved to local terms and conditions of employment	10i. Human Resources to monitor the effectiveness of measures taken to improve recruitment and retention across the authority , in collaboration with Services. 10ii. Any future review of the recruitment and retention strategy should consider the feasibility of a staff referral scheme.	MAT/Group Heads/ /GH C & T/HRM * Cllr Boughtflower	30 September 2019 R * Requires monitoring	10i. Completed/Ongoing Monitoring . There are many external factors which have an ongoing impact on recruitment and retention. Group Head Commissioning and Transformation presented a briefing note prepared by the Human Resources Manager to the March 2019 Audit Committee setting out the effectiveness of measures being taken in this area. 10ii. At July 2019 - no updates have been received in this area.
19			11a. Procurement - If governance arrangements are weak with a lack of transparency, this could result in any of the following: financial penalties for non-compliance with legislative requirements; contractual disputes and claims through poor specifications; contractors/partners failing to deliver expected outcomes; reputational damage, challenge and poor VFM. (This section links also with section 4 above - Project Management) (ALL PRIORITIES)	3	3	3	Contract Standing Orders (April 2016). Contract guidelines with compliance checklist (to be updated). Requirement for declaration of interests (Officers and Members). Corporate Procurement training provided in May 2019. E-procurement system in place and contracts sourced with this solution. Revised Procurement strategy and vision (February 2019) An initial indicative spend analysis exercise undertaken during 2019. Developing improved reporting systems. Interim Procurement Manager in post to establish revised procurement processes. Enhanced monitoring for key suppliers now added to the S&P Watch list to enable concerns to be picked up pro-actively	11i. Full compliance with the Local Government Transparency Code is required and should be confirmed once achieved. 11ii. 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. 11iii. 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. 11iv. The future of the Procurement Board to be considered as part of a review of all boards across the authority. 11v. Revised Procurement processes are being established . 11vi Recommendations arising from the recent Internal Audit review (NEW)	MAT /HOCG *Cllr Boughtflower	30 September 2019 R * Requires monitoring	At July 2019 - no updates have been received from the accountable officer. The Internal Audit Manager has updated this section to the best of her knowledge. 11i & ii Outstanding 11iii. In Progress -Training has taken place (May 2019) attended by a number of Service representatives. The external trainer highlighted regulatory requirements (PCR 2015) for further consideration. A further session to outline local processes including Spelthorne's Contract Standing Orders seems appropriate to promote awareness and understanding of expectations. 11iv. Completed - A Procurement Projects group has been set up instead of a formal board, meeting monthly. This coincided with production of a monthly PPG Report to regularly advise stakeholders on the status of a range of procurements. 11v. In Progress - The interim Procurement Manager is leading on establishing and implementing revised Procurement processes. Linkages between project governance and procurement continue to be integrated into processes to ensure alignment. Head of CG attended Audit Committee in March to provide an update on proposed changes/ actions.
20			11b. Major Procurement - A lack of ongoing forward planning in preparation for the expiry of existing Leisure Centre arrangements in 2021 may result in delays in delivery of key project milestones and provision of leisure facilities to the community. If the project is not effectively managed, this could result in overspends, delays and significant ongoing strain on the Council's financial resources. (This section links also with section 4 above - Project Management)	3	3	3	Current Leisure centre operator contract ends 2021. "Leisure Centre Needs Analysis" submitted to MAT in 2014 and updated in 2017, which endorsed the recommendation to carry out a feasibility study. A high level discussion document was presented to Cabinet in October 2016 and a project team formed. Project Sponsors and Project Managers identified. Project related documentation. Risk Register. Councillors and staff kept informed of key progress milestones, requirements and timeframes . Feasibility study completed March 2018 by specialist Advisors, design brief signed off and public consultation undertaken in summer 2018 .	11b. Assessment of possible sites for the new leisure centre is under consideration with further proposals for consultation to be issued in due course .	Dcex (LO)/ Group Head CW* Cllr Attewell	30 September 2019 R * Requires monitoring	11b. March 2019 - In Progress - The report to Overview and Scrutiny in January 2019 states that a timetable for the next phase of consultation on the Council's plans for a new Spelthorne Leisure Centre will be decided once the review of alternative locations for the facility have been completed and options identified. The team are continuing to assess alternative sites and are intending to peer review those to obtain an independent view, prior to any public consultation. At July 2019 - no updates have been received from the accountable officer in this area.

	A	B	C	D	E	F	G	H	I	J	K
	PREVIOUS RAG	CURRENT RAG	RISK / IMPACT (WITH REFERENCE TO CORPORATE PRIORITY)	LIKELIHOOD OF RISK	IMPACT OF RISK	LEVEL OF RISK (to evaluate)	CONTROLS	OUTSTANDING ACTIONS	RISK OWNERSHIP	TARGET DATE	PROGRESS /REASONS WHERE NOT IMPLEMENTED
7											
21			12. External factors including national housing shortage , insufficient affordable properties, London Boroughs increased use of Spelthorne properties and welfare reforms such as Universal Credit may all impact on the effective delivery of Spelthorne's Housing Service to the community. Ongoing uncertainty over recovery of outstanding Housing Benefit debt. (HOUSING)	3	3	3	Group Heads/ MAT/Members are aware of ongoing risks in this area. Local Plan Policy currently being reviewed. Housing and Homelessness Strategies. Universal Credit rollout/migration is under consideration. Housing Benefit regulations (DWP) stipulate limitations around overpayment debt recovery. Current debt stands at approx. £3m. Internal Audit review of Housing Benefit Overpayments completed March 2019 and recommendations implemented by management (see risk category 19). Discretionary housing payments Corporate Debt Group and Strategic Housing Group monitor progress. Officers and A2D continue to work with families affected by the benefit cap. Close working with private landlords. Landlord guarantee scheme. Knowle Green Estates Ltd (subsidiary) focusing on the Housing Delivery Programme to meet Housing targets - a review/audit of the governance arrangements of Knowle Green Estates is due to take place . Council was assessed by the Ministry for Housing, Communities and Local Government as being well prepared for the implementation of the 2018 Homelessness Reduction Act, which was reported to Overview and Scrutiny in January 2019.	12i. Management Team to continue to monitor the ongoing pressures facing the Housing Service (eg impact of SCC cuts) 12ii.As part of the 'duty to refer' requirement of the 2018 Homelessness Reduction Act statutory responsibility for making referrals into the local housing authority rests with the public body or agency. Housing are continuing to work proactively with all public bodies to promote awareness and encourage referrals into Spelthorne, ensuring pathways are clearly communicated. This will ensure that any wider risk implications in terms of homelessness levels for Spelthorne are minimised through early intervention(NEW) 12iii. Review of Housing and Homelessness strategies to include stakeholder involvement and participation. (NEW)	MAT / Joint Group Heads CW * Cllr Attewell	Completed/ Ongoing Monitoring	12i. Ongoing. 12ii. This new action is included for monitoring purposes. Overview and Scrutiny at its January 2019 meeting received a positive report on the successful implementation of the Homeless Reduction Act. Likewise the recent internal audit review relating to 'embedding of processes arising from the 2018 Homelessness Reduction Act' provides effective assurance of this area.
22			13a. Uncertainty over economic growth and supplier failure could impact on: • Delivery of contracts and services • Business Rate income collected/retained , thereby affecting the Council's overall finances. (ECONOMIC DEVELOPMENT & FINANCIAL SUSTAINABILITY)	2	3	3	Financial Services monitor the financial media in relation to larger companies and critical commercial partners. Enhanced Monitoring arrangements implemented as key suppliers now added to the S&P Watch list . Aim to maximise Business Rate collection/minimise losses for the Council. Additional quarterly monitoring of collection and projected outturn retention implemented . Additional counter fraud resource is available to identify and investigate potential tax avoidance and evasion cases, which can be translated into cashable savings for the authority. (Being pursued under Corporate Counter Fraud work).	13i. Impact of Business Rate arrangements on Council finances is under ongoing review. 13ii. Spelthorne are participating in the 100% retention of business rates pilot for 2018/19 providing further incentive to maximise income collection	DCX (TC)/ Deputy Group Head CR * Cllr Harman	Completed/ Ongoing Monitoring	13i. Implemented and ongoing. 13ii. Implemented and ongoing. Exceeded target for 2018-19 "100%" Business rates retention pilot. Business rates collection rate for 2018-19 stands at 99.7%, representing the best ever. Counter fraud measures are being considered for small business rate relief cases in collaboration with the Surrey Counter Fraud Board (see risk category 20).

	A	B	C	D	E	F	G	H	I	J	K
	PREVIOUS RAG	CURRENT RAG	RISK / IMPACT (WITH REFERENCE TO CORPORATE PRIORITY)	LIKELIHOOD OF RISK	IMPACT OF RISK	LEVEL OF RISK (to evaluate)	CONTROLS	OUTSTANDING ACTIONS	RISK OWNERSHIP	TARGET DATE	PROGRESS /REASONS WHERE NOT IMPLEMENTED
7											
23			13b. If the Economic Development Strategy fails to be implemented, this could impact on growth (ECONOMIC DEVELOPMENT)	2	3	3	Regular reporting to Members. A 5 year economic assessment & development strategy for 2017 - 2022 (previous audit recommendations were taken into account). Economic Development Strategy is reviewed every twelve months. Annual review and refreshing of the strategy, enabling targets that have been achieved to be commented upon and removed; new targets that have emerged over the previous twelve months are then included. Prioritisation of projects to benefit from the business rates retention has been completed.	13bi. <i>Economic development is a Council priority and growth will impact on business rate income - this is under ongoing review.</i> 13bii. <i>Regarding governance, 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. The refreshed strategy needs to be approved by the EDEG.</i>	DCX (TC) */GH R & G*/ EDM* Cllr Barnard	Completed/ Ongoing Monitoring	13bi & ii. Implemented and ongoing review. At July 2019 - there are no further updates to report for this area.
24			14. If there was failure to comply with statutory duty / adhere to Safeguarding Policy, (including failure by County to address Spelthorne referrals), this could lead to death or injury to a child or vulnerable adult, resulting in legal action and reputational damage. (CLEAN & SAFE ENVIRONMENT)	2	4	4	Council has statutory responsibility for safeguarding children and Adults. Approved and publicised 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 Surrey County Council and the Surrey Safeguarding Children's Board (SSCB). Annual Section 11 audit (a review of training records was also undertaken in 2018). Liaison with Human Resources for training purposes and DBS checks. Online safeguarding training module and cascade training. Procedure to deal with the Multi Agency Safeguarding Hub (MASH) enquiries. Spelthorne is represented on the new Early Help Advisory Board by the Deputy Chief Executive. A restructure of Surrey County Council Children's services is currently being undertaken. This will mean that the procedure for referrals to MASH/Early Help will change.	14i. <i>Officers are currently undertaking the statutory children's Safeguarding audit which is completed annually. Any recommendations arising are to be considered.</i> 14ii. <i>Monitoring of any likely changes to the safeguarding referral process and subsequent implementation</i>	DCX (TC)/LSM/ LM/Joint Group Heads - CW * Cllr Attewell	30 September 2019 R * Requires monitoring	14. In Progress - Results of the children's audit have been received and there are some recommendations to address. The Surrey Borough and District group have asked the children's safeguarding team to attend their meeting to discuss the audit recommendations for all the Boroughs and Districts as some themes are similar. Awaiting feedback following submission of an adult safeguarding audit . 14ii. Implemented/Ongoing - With the transformation taking place at Surrey County Council it has been more challenging to maintain key relationships and to understand changing processes. An internal officer group has been set up which meets monthly to coordinate responding to safeguarding and early help issues. Surrey have slightly changed their referral 'front door' and this has been communicated to staff. Further adult safeguarding training has taken place. A safeguarding briefing now takes place at each staff induction and a presentation for new Cllrs took place.

	A	B	C	D	E	F	G	H	I	J	K
	PREVIOUS RAG	CURRENT RAG	RISK / IMPACT REFERENCE TO CORPORATE PRIORITY)	LIKELIHOOD OF RISK	IMPACT OF RISK	LEVEL OF RISK (to evaluate)	CONTROLS	OUTSTANDING ACTIONS	RISK OWNERSHIP	TARGET DATE	PROGRESS /REASONS WHERE NOT IMPLEMENTED
7											
25			15. In light of ongoing reduction in Central Government funding, if opportunities for significant income generation and investments are missed, then this will impact on the Council's ability to close the budget gap and deliver vital services. If weak governance arrangements prevail, this may contribute to poor investment outcomes and increase exposure to financial risk including loss of anticipated rental income and poor investment returns. (FINANCIAL SUSTAINABILITY)	3	4	4	Long term strategic/financial plan. Corporate Plan / priorities reviewed. Member engagement. The Council is applying innovative ways to fund services and create new revenue streams through significant commercial asset acquisitions and investments. Since September 2016 an additional ongoing annual net income of £9.5m has been generated from commercial asset acquisitions. This 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. Advice is sought from the Treasury Management advisors as appropriate. Thorough due diligence undertaken with respect to leases and acquisitions and with respect to evaluating strength of covenant of tenants- now using S&P to evaluate. A second set of advisers used to independently assess the robustness and appropriateness of modelling assumptions for acquisitions. A robust governance framework has been developed and continues to support property acquisitions and investment processes, to include 1. Asset Governance framework and action plan; 2. Property Investment Strategy; 3.DIG meet weekly to track project progress plus a Councillor led Investment and Development Committee; 4. Revised regulatory investment guidance (Feb 18) requires LA'S to develop quantitative indicators to assess a local authority's total risk exposure as a result of its investment decisions, with reporting on Prudential indicators; 5. Presentation by the Portfolio Holder for Finance and DCX (TC) to O & S on the council's approach to management of risk; 6. Robust Treasury Management Strategy; 7. Weekly update to MAT on status of Priority Flagship projects(incl. commercial asset acquisitions). Further control measures for this risk category are recorded below.	15i. A robust governance framework continues to be developed to support property acquisitions and investment processes. 15ii. Robust and effective systems need to be in place to record and recover significant rental income due to SBC from it's increased property portfolio.	MAT/GH R & G* Cllr Harman	31 December 2019 R * Requires monitoring	15i. Implemented/ Ongoing . Performance is monitored regularly at Development and Investment Group (DIG) and a quarterly performance report is produced for the Investment Portfolio. DIG comprises of senior officers from across the Council and meets weekly to undertake a review of performance of acquisition, progress of developments, and evaluation of possible acquisitions. Monthly meetings of Investment and Property Committee (IPC), on which Leader and Finance Portfolio Holder sit, review and discuss performance of investments, developments and consider/ evaluate possible acquisitions and whether to put forward to Cabinet for consideration. Planned reporting of prudential indicators has taken place and went to the Development and Investment Group (DIG), with formalised reporting to take effect once the new Property Management System is operational. Council approved at its February meeting the Capital Strategy. The new draft Strategy was scrutinised by Overview and Scrutiny as a draft before going to Council for approval. The first internal officer quarterly review of the Capital Strategy has been undertaken, and updated to reflect the fact that a number of new development proposals are coming forward. The next review will consider further development of performance indicators 15ii. Progress underway- Work is underway to deliver a new Property Management System to effectively manage Spelthorne's property portfolio (investment, community, commercial and residential properties).Tenders for the Property Management System have been evaluated and a decision on the supplier was made in April 2019 (report to Cabinet 27 March). The initial 'go live' implementation is anticipated in December 2019.The Council uses expert external advisors (where required) for its investment portfolio to manage matters such as service charges. DIG receives timely updates on rental income collected on the Council's commercial investment assets. The Deputy Chief Executive (TC) has advised of 100% of commercial assets rent due having been received within 2 weeks of q date for quarter 4.
26											
27			Risk Category 15 (See above)				Further control measures relating to risk category 15 (Property Acquisitions) Monitoring arrangements relating to property development work arising from asset acquisitions - The Group Head for Regeneration and Growth prepared a briefing note for Audit Committee in November 2018 on monitoring arrangements, for example quality control measures undertaken by professionals. Due Diligence measures for tenant management - The Council has brought in additional advisers to provide a second opinion on lead advisers advice, and to produce reports on the financial robustness of tenants in potential and acquired acquisitions. The Council has subscribed to Standard &Poor's credit rating database and set up watch lists for its tenants to alert it to any deterioration in the health of its tenants. Where there is any deterioration the potential impact of this is reviewed by the internal team. Sensitivity analysis is undertaken with respect to variables such as rental growth.	Risk Category 15 (See above)			Risk Category 15 (See above)

	A	B	C	D	E	F	G	H	I	J	K
	PREV IOUS RAG	CUR RENT RAG	RISK / IMPACT REFERENCE TO CORPORATE PRIORITY)	LIKELIHOOD OF RISK	IMPACT OF RISK	LEVEL OF RISK (to evaluate)	CONTROLS	OUTSTANDING ACTIONS	RISK OWNERSHIP	TARGET DATE	PROGRESS /REASONS WHERE NOT IMPLEMENTED
7											
28			16. If there is reduced service capacity then this may result in greater instances of error, loss, fraud, theft , irregularity, all representing a loss of internal control and weakened control environment. (ALL PRIORITIES)	3	3	3	Management as the first line of defence in the overall assurance framework 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 independent/management checks. In such cases compensating controls are required which is promoted by Internal Audit where deemed appropriate. In some areas additional resources have been provided. Adequate staff contingency arrangements need to be built into core processes. Key governance roles have also now been in place for some time in areas such as Procurement and Information Governance.	16i. A recurring theme across some service areas is resourcing constraints often combined with weak resilience arrangements. These are often highlighted as reasons for controls and governance processes being compromised within functions/corporate systems and processes. Associated with this is a lower level of assurance and therefore MAT need to keep this area under review.	Group Heads/ MAT/DCX (TC) All Portfolio Holders	Completed/ Ongoing Monitoring	16. i. Completed/Ongoing Monitoring - Additional growth to provide additional resources in HR, Accountancy, Legal and Property was built into the 2018-19 budget and various appointments have since been made. Further growth approved and built into the 2019- 20 Budget for ICT, HR, Environmental Health and Assets. A review of the Accountancy structure is also planned to take place shortly which may help further to assess staff contingency arrangements/requirements. Resilience is being considered as part of all root and branch service reviews, referred to under risk category 8 above.
29			17. In light of the changing political landscape & Brexit, this represents many potential uncertainties of a recruitment, financial, regulatory and supply chain management nature arising from currency devaluation/volatility, trade, investments, relocation of Partners/Suppliers, changing access to EU funds, level of compliance with EU regulations , workers rights (EU Nationals). These could all impact on existing policies, procedures, and processes. ALL PRIORITIES	3	3	3	The Group Head for Commissioning and Transformation is the Corporate lead for Brexit. Summary briefing note issued to MAT/Cabinet/Audit Committee in August 2018 on possible implications of a Brexit "no deal" on the Council .This note highlighted the potential indirect impact in terms of skills shortages with implications for increased costs and timings, particularly in the construction and social care sectors. Further briefing note presented to Audit Committee in March 2019. Brexit Continuity Planning continues to takes place.	17i. MAT to regularly consider potential Brexit uncertainties for Spelthorne and have a plan in place to address. 17ii. Group Head Transformation & Commissioning is participating in regular Countywide Brexit Continuity Planning meetings and briefing MAT, Group Heads and Members . (REVISED)	MAT/ Group Heads All Portfolio Holders	30 September 2019 R * Requires monitoring	17i. Progress underway - MAT and Group Heads are briefed regularly regarding developments. 17ii. Progress underway - There is of course continued uncertainty associated with scenario planning for Brexit. The Group Head for Commissioning and Transformation considers that overall Spelthorne are aware of the risks and trying where possible to address these. A weekly report on preparedness for Brexit is issued to the Local resilience Forum which feeds through to Central Government. Also attending weekly tactical and fortnightly strategic teleconferences with the Local Resilience Forum to ensure contingencies where appropriate in place. Services are updating on any information/impacts relevant to their service via weekly reports back to the LRF and onto central Government. Services are noting potential implications including staffing, environmental health and data protection. Group Head for Commissioning and Transformation prepared a summary briefing for MAT/Cabinet/Audit Committee in March 19 on possible implications of a Brexit "no deal" on the Council. Currently awaiting further instructions on next stages once new Prime minister in post
30			18. If the Council receives a poor return on long term investments and/or investments become insecure in the current climate, then this will have an adverse impact on the Council's financial position. (FINANCIAL SUSTAINABILITY)	2	3	3	Treasury Management Strategy approved annually by Members. Reporting of Treasury Management performance to Members. Aim to select counter parties of the highest credit quality; credit ratings monitored closely and apply criteria recommended by Arlingclose. Council's investments managed internally in consultation with Arlingclose. Roles and responsibilities assigned within Accountancy. Deputy Chief Executive and Portfolio Holder are involved in key decisions. Regular monitoring ,reporting of investment portfolio and returns achieved. CIPFA Code of Practice and Prudential Code being applied with new recommended indicators for measuring investment performance.	18. The team are addressing the recommendations arising from the recent internal audit review of the Treasury Management function (NEW)	DCX (TC) * Cllr Harman	30 September 2019 * R Requires Monitoring	18. Completed/Ongoing review. The team continues to explore options for diversifying the portfolio. Approved Capital Strategy (see risk category 15). The Council exceeded Treasury Management target income for 2018/19 and achieved average rate of interest on medium term pooled funds of 4.23%

	A	B	C	D	E	F	G	H	I	J	K
	PREV IOUS RAG	CUR RENT RAG	RISK / IMPACT REFERENCE TO CORPORATE PRIORITY)	LIKELIHOOD OF RISK	IMPACT OF RISK	LEVEL OF RISK (to evaluate)	CONTROLS	OUTSTANDING ACTIONS	RISK OWNERSHIP	TARGET DATE	PROGRESS /REASONS WHERE NOT IMPLEMENTED
7											
31			19. If there is a failure to collect/recover income due, this will result in financial losses to the authority. Where there is poor system integrity due to increased risk of error, duplication of data, irreconcilable systems and inefficient processes, this could lead to a significant level of aged debt and financial losses. (FINANCIAL SUSTAINABILITY)	3	3	3	Corporate Debt Group monitor the more material items on the aged debt analysis and also coordinate action to tackle debt that is unlikely to be recovered, reviewing progress made by lead Officers. Monitoring developments in recovering CIL focuses on larger sums due. Some good results have been achieved in enforcing collection and monitoring CIL debts. The Chief Finance Officer reviews a monthly status report of higher value aged debts over 6 months old for reasonableness. Analysis undertaken by Customer Services to identify and address historic debts which are not cost effective to pursue or with low probability of recovery, and therefore require write off. A progress review of relevant audit recommendations is discussed at each Corporate Debt Group meeting. Recovery policies recently reviewed (Corporate Debt and HBO). Debt collection statistics produced and analysed. Budget Monitoring identifies any anticipated shortfall in income. Accountancy report to Management Team and Members on significant variances and comparisons with previous year. Housing Benefit regulations (DWP) stipulate limitations around overpayment debt recovery. Current debt stands at approx. £3m. Internal Audit review of HBO (March 2019)recommendations implemented.	19i. The corporate debt recovery policy is being reviewed 19ii. In order to improve efficiency, there is scope for Customer Services to take greater control over the persual of all sundry debts at every stage. (REVISED) 19iii. Further to the recent audit review of Housing Benefit Overpayments, increased reporting (management information and breakdowns) will help to enhance visibility in terms of debt monitoring of this complex area. This will be pursued in collaboration with the Corporate Debt Group. 19v. Development of systems to assist in monitoring of Bed and Breakfast debt in terms of enhancing efficiency and avoiding duplication is ongoing.	MAT/ DCX, TC/AGH CR/ Group Heads Cllr Harman	30 September 2019 * R Requires Monitoring	19i. Completed - The Debt Recovery Policy has been updated and revised draft circulated to relevant colleagues for comment, before going to MAT for approval. 19ii. Progress underway - This point has been reiterated in the recent internal audit review of sundry debtors with regards action beyond the stage three invoice reminder. If Customer Services are to take a greater lead role in the persual of all sundry debts including decisions where appropriate and firming up expected response timelines from Services, this needs to be reflected in the revised corporate debt policy to ensure clarity (see action 19i). 19 (iii) Implemented/Ongoing - The Housing Benefits Manager now issues Housing Benefit Overpayment debt breakdown reports to the Corporate Debt Group. 19 (v) In Progress - Project set up to address and move forward the operational issues but resourcing, skillset and possibly ownership remains an issue. Weekly payments cycle for Housing Benefits has been agreed with the Council's External Auditors, BDO and is being applied to address timing differences. A planned internal audit review is underway.
32			20. Environmental breakdown represents a significant global threat driving social and economic disruption with far ranging consequences for socioeconomic stability ; climate change and extreme weather events such as flood and extreme heat impact on food systems, supply chains and procurement, economic productivity and losses. (CLEAN AND SAFE ENVIRONMENT)	3	4	4	Consideration of Government targets for reducing carbon emissions/greenhouse gases to tackle climate change. Whilst there are no specific targets set on local councils, Officers are working in the spirit of ethical and social responsibility to address climate change concerns, reviewing the Council's carbon footprint and thereby contributing to the overall government targets. Sustainability Strategy Energy & Water Efficiency policy (2015 - 2020) Corporate Emergency Plan. Consideration as part of project implementation as follows : New developments - renewable generation Fuel Poverty - promote energy efficiency measures, Increased renewables capacity with solar PV installations on 2 DayCentres EV and further plans to do so on other sites charging provision at some car parks.	20i. As this is a new risk category, any relevant actions for inclusion will be discussed at the Corporate Risk Management Group.	MAT/ GH - NS SO - MR	30 September 2019 * R Requires Monitoring	This is a new risk category for inclusion on the Council's Corporate Risk Register. A report from the Institute for Public Policy Research (IPPR) has concluded that global greenhouse gas emissions must be reduced by 45% from 2010 levels by 2030 to avoid catastrophic warming.
33			21. If there is an increased risk of fraud / theft arising from a weak control environment this will result in financial losses and reputational damage. Housing tenancy fraud reduces availability of social housing impacting on the Housing register. Business Rates Avoidance and Evasion results in loss of income. (FINANCIAL SUSTAINABILITY & HOUSING)	3	3	3	Various corporate Policies including Confidential Reporting Code (Whistle blowing), Anti-fraud, Bribery and Corruption Strategy, Proceeds of Crime and Anti-Money Laundering, Code of Conduct, Financial Regulations and Contract Standing Orders. Fundamental controls to be embedded to enable prompt identification and investigation of discrepancies, errors and potential theft or fraud. (Management oversight, segregation of duties, financial reconciliation processes, authorisation limits and IT Security measures). Specialist Fraud groups with Surrey Partners enable sharing of skills, knowledge and approaches. Fraud alerts circulated. Enhanced verification checks for new housing claims. Non-benefit fraud returns are collated quarterly, focusing on housing, council tax support, and business rates (evasion and avoidance). These are reported to the Surrey Counter Fraud Board. Collaborative working with Reigate and Banstead's Counter Fraud team has continued to produce positive outcomes and impressive financial returns/payback. Wider benefits are also being realised from this counter fraud work and a further growth bid has been secured (February 2019) for these counter fraud measures to continue. Overview & Scrutiny Committee report of 2018(tax evasion/avoidance)	21i. To arrange refresher Counter Fraud, anti-bribery and corruption training for all staff and Members. 21ii. To undertake a risk assessment for money laundering to ensure compliance with regulations.	Group Heads/ MAT/IAM/ Head of CG Cllr Harman & Cllr Attewell	30 September 2019 * R Requires Monitoring	At 31.3.19 the cumulative fraud return for Spelthorne (since the start of the Surrey Fraud Partnership in January 2015) equates to just under £2.5m in terms of notional savings to the public purse, with estimated cashable savings for Spelthorne of £482k. This figure incorporates positive fraud outcomes for Corporate Fraud (non-benefit fraud) and includes Housing, Business Rates and Council Tax. Further counter fraud measures are being explored in partnership with the Surrey Counter Fraud Board which will provide continued benefits for all partner authorities. 21i. Progress underway. The Internal Audit Manager has outlined requirements for inclusion in Counter Fraud, anti-bribery and corruption refresher training for staff and Members. Discussions are being held with the suitably identified trainer to take this further forward, with a view to scheduling mandatory training sessions for Autumn 2019. 21ii. At July 2019 - No further updates have been received from the accountable officer for this area.
						*KEY TO RAG RATING					
34											
35			Actions Overdue & Outstanding			Partially Actioned			Completed/Ongoing Monitoring		

	A	B	C	D	E	F	G	H	I	J	K
	PREVIOUS RAG	CURRENT RAG	RISK / IMPACT (WITH REFERENCE TO CORPORATE PRIORITY)	LIKELIHOOD OF RISK	IMPACT OF RISK	LEVEL OF RISK (to evaluate)	CONTROLS	OUTSTANDING ACTIONS	RISK OWNERSHIP	TARGET DATE	PROGRESS /REASONS WHERE NOT IMPLEMENTED
7											
36			Note that previous RAG ratings are included to illustrate the Direction of Travel for recommended actions								
38			*KEY TO TARGET DATES			* N = New Action		*R = Revised target date for assigned action		*O = Original target date for assigned action	
39			*KEY TO OFFICERS								
40			MAT - Management Team								
41			CX, - Daniel Mouawad								
42			Head of CG – Head of Corporate Governance, Michael Graham					GH R & G - Group Head - Regeneration and Growth, Heather Morgan			
43			Deputy Head of ICT – Alistair Corkish					IGO - Information Governance Officer, Clare Williams			
44			DCX (TC) – Terry Collier					HRM – Human Resources Manager, Debbie O’Sullivan			
45			HSIRM - Health and Safety, Insurance and Risk Manager – Stuart Mann					CM- Contract Managers			
46			GH C & T - Group Head - Commissioning and Transformation, Sandy Muirhead					Joint Group Heads of CW – Joint Group Heads for Community Wellbeing, Deborah Ashman and Karen Sinclair			
47			GH - NS - Group Head - Neighbourhood Services- Jackie Taylor					LSM - Leisure Services Manager, Lisa Stonehouse			
48			DCX (LO) – Lee O’Neil					RRO – Risk and Resilience Officer, Nick Moon			
49			SEHM - Senior Environmental Health Manager, Tracey Wilmott-French					EDM – Economic Development Manager, Keith McGroary			
50			PS - Principal Solicitor, Victoria Statham					IAM - Internal Audit Manager, Punita Talwar			
51			AGH CR - Acting Group Head for Customer Relations, Roy Tilbury					SO- Sustainability Officer, Mark Rachwal			
52											
53			PORTFOLIO HOLDERS - recorded under risk ownership column								
54											
55											
56											
57											