









# Strategic Risk Register @ January 2025








Risk Ref	Risk Title and Description	Previous score (Sept 2024)	Movement in risk score	Current risk score (Jan 2025)	Target risk score and date	Progress to Date (incl. current risk mitigating controls and further actions to be taken to manage risk and action date)	Key Sources of Assurance (3 lines of defence)
1	<p><b>Children’s Social Care</b></p> <p>If the council does not put in place robust arrangements and receive appropriate assurances to ensure that the Sandwell Children’s Trust (SCT) addresses the areas of poor or inconsistent performance, as outlined by Ofsted (and as required by the Statutory Direction served on the council on 6 October 2016), with rigour and pace, then the council will fail in its responsibilities to:</p> <ul style="list-style-type: none"> <li>Safeguard vulnerable children</li> <li>Promote and improve the outcomes of children in its care</li> <li>Manage any adverse financial consequences arising from the failure to create favourable outcomes for children within the resources available to it</li> <li>Continue on its progress to date and direction of travel to further improve the council’s reputation for children’s social care as currently demonstrated by the ILACS inspection.</li> </ul> <p>Risk Area – Children’s Services Risk Owner – Sally Giles, Director of Children and Education Cabinet Member: Councillor Jalal Uddin <b>Objectives impacted: 1</b></p>	8 (amber)		8 (amber)	4 (green) Good Outcome of ILACS inspection by May 2025	<p><b>Current and Ongoing Controls</b></p> <ul style="list-style-type: none"> <li>Performance and contract management against KPIs and the improvement plan. New KPIs have been agreed and implemented as part of the contract review process and have taken into account the Ofsted findings, as well as any findings from the national Care Review commissioned by the DfE around early help, children’s social care and partner collaboration ahead of the issue of new statutory guidance contained in Working Together 2023.</li> <li>The Ofsted inspection of adoption services commissioned through the RAA and delivered by the Trust rated all areas as ‘Good’.</li> <li>The most recent Ofsted inspection of the Fostering service rated all areas as ‘Good’.</li> <li>Completion of case file audits and learning from the audit is used to ensure practice improvement.</li> <li>Ongoing measures to improve staffing levels and recruitment via the development of a workforce strategy and market supplements.</li> <li>The Inspection of Local Authority Children’s Services (ILACS) took place in <a href="#">May 2022</a> and reported a judgement of ‘Requires Improvement to be Good’ and continues to inform the risk score.</li> <li><a href="#">Contract review</a> was undertaken and presented to Cabinet in September 2022 resulting in a recommendation being made to the Secretary of State not to invoke the break clause within the Service Delivery Contract.</li> <li>OFSTED undertook an inspection of the Fostering Service in October. It was again judged as ‘Good’, however recognised that SCT needed to put a permanent registered manager in post.</li> </ul> <p><b>Further Actions</b></p> <ul style="list-style-type: none"> <li>Development of a Family Help strategy to replace the previous Early Help Strategy, reflecting the government’s response (Stable Homes Built on Love) to the <a href="#">Independent Review of Children’s Social Care</a>. Implementation of a shared practice model across services.</li> <li>The LGA undertook a peer review in January 2025 and advised that: <ul style="list-style-type: none"> <li>Clear progress has been made however, the Trust’s practice reviews, QA system and the LGA case reviews confirm that recommendations from the 2022 Ofsted Inspection in relation to children we care for and those who are care experienced need ongoing rigorous focus.</li> <li>The Trust needs to further consider the best use of their existing resource to creatively free up social work capacity enabling them to do their best work.</li> <li>Further focus is needed on the importance of recording for those who are care experienced and shifting the culture to one where recording is integral to young person-centred practice.</li> <li>Given the statutory responsibilities for the recently appointed Lead Member, including the line of sight on social work practice, the engagement in a further programme of development including the LGA offer would be beneficial.</li> <li>The Trust needs to address delays in achieving permanence for some children with a plan for a special guardianship order.</li> <li>Further work with adult social care and other adult services should be expedited to drive forward improvements on transitional safeguarding issues.</li> </ul> </li> </ul> <p>The recommendations from the review will be considered by SCT and the Council and actions devised to address them.</p> <p>The ongoing shortage of social care workers (which is the position locally and nationally) continues to impact this risk alongside care challenges in relation to sufficiency of placements that meet the needs of Sandwell children and the rising cost of residential care placements</p>	<p><b>1<sup>st</sup> line</b></p> <p>Key Performance Indicators (including social worker vacancy rates and placements)</p> <p>Operational Partnership and Strategic Partnership Boards</p> <p><b>2<sup>nd</sup> line</b></p> <p>Sandwell Local Safeguarding Children’s Board Annual Report</p> <p>Reports to Scrutiny</p> <p>Rolling programme of audits of case files as part of the quality assurance framework</p> <p>Performance Management framework and Service Delivery Contract</p> <p>SCT business plan</p> <p>Corporate Parenting Board</p> <p><b>3<sup>rd</sup> line</b></p> <p>Ofsted monitoring and focussed visits</p> <p>DfE improvement Board (independently chaired by a DfE consultant</p> <p><a href="#">Grant Thornton – Value for Money Governance Review 2021</a></p> <p>ILACS Ofsted inspection July 2022</p> <p>Independent Reviewing Officer function</p> <p>SCT external audit report</p> <p>LG Futures benchmarking exercise</p> <p>Grant Thornton Value for Money Governance Review - <a href="#">Follow Up- December 2022 and</a> September 2023</p>
2	<p><b>Business Continuity Management</b></p> <p>If the council does not develop, review, monitor and test plans and capabilities that seek to maintain the continuity of key functions in the event of an unplanned disruptive incident, then it will be unable to perform critical business functions which will impact the provision of council services and result in potential financial loss and loss of public confidence in the council.</p> <p>Risk Area – All council services Risk owner – Alan Lunt, Executive Director – Place Cabinet Member: Councillor Suzanne Hartwell <b>Objectives impacted: All</b></p>	8 (amber)		8 (amber)	8 (amber) Achieved	<p><b>Current and Ongoing Controls</b></p> <ul style="list-style-type: none"> <li>Services are reminded on a quarterly basis to ensure their business continuity plans are up to date to mitigate the denial of staff (e.g. illness, industrial action), ICT (e.g. software failure, cyber-attack), facilities (e.g. building closure), stakeholders (e.g. suppliers, partners). These plans identify the criticality of each council service and the arrangements in place to restore services in the event of an unplanned incident.</li> <li>An SBS outage in May 2024 was well managed by the Council demonstrating learning from the event in May 2022.</li> <li>Service workshops with a focus on ICT to improve business continuity planning, led by the Resilience Team and supported by ICT, held with 4 services with 6 more scheduled for 24/25.</li> </ul> <p><b>Further Actions</b></p> <ul style="list-style-type: none"> <li>Following the implementation of the new Oracle Fusion business system in October 2024 services have been directed to review plans and corporate planning undertaken to document response to any outage.</li> <li>Recommendations from the September 2024 MySandwell outage being undertaken by ICT and services asked to review and include contingency arrangements in business continuity plans.</li> <li>Services to arrange business continuity workshops and take up offer from Resilience Team to support.</li> </ul>	<p><b>1<sup>st</sup> line</b></p> <p>Review program of emergency plans</p> <p>Service business continuity plan register and monitoring</p> <p>Post incident reports</p> <p>Test exercises including cyber exercise</p> <p><b>2<sup>nd</sup> line</b></p> <p>Resilience Team reports to Leadership Team</p> <p><b>3<sup>rd</sup> Line</b></p> <p>Audit and Risk Assurance Committee</p>


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3	<p><b>Compliance with the Data Protection Act 2018 (DPA 2018), the General Data Protection Regulations (GDPR) and Freedom of Information Act 2000 (FOIA)</b></p> <p>If the council does not ensure it has a robust framework in place to comply with the DPA 2018 (which includes GDPR) or FOIA then there is a risk that personal data is misused or misplaced. This could negatively impact 'data subjects' (normally our residents) and expose the Council to significant external action, including fines, from the Information Commissioner's Office for failing to undertake its statutory duty.</p> <p>Further, failing to comply could result in negative public reaction and reputational damage, significant resourcing to correct issues. There could also be monetary penalties, loss of confidential data and potentially legal action.</p> <p>Risk Area – Finance and Transformation</p> <p>Risk Owner- Mike Jones, Assistant Director – Legal and Assurance</p> <p>Cabinet Member: Councillor Paul Moore</p> <p><b>Objectives impacted: 3</b></p>	12 (red)		8 amber  March 2025	8  March 2025	<p><b>Current and Ongoing Controls</b></p> <ul style="list-style-type: none"><li>The Information Governance Board which is chaired by the Senior Information Risk Owner (SIRO) or Data Protection Officer (DPO) meets monthly to monitor progress of the information governance (IG) workplan.</li><li>IG framework sets out the council's policies, requirements, standards and best practice that apply to the handling of information. The policies were reviewed in 2024 and review is scheduled to commence during the first quarter of 2025.</li><li>Information Asset Registers capture the information held by the council service areas and are reviewed annually.</li><li>Information champions disseminate, feedback, facilitate and co-ordinate IG activity.</li><li>Monthly review of ICO updates, guidance and sector practice.</li><li>Annual completion of and compliance with the NHS self- assessment toolkit -NHS Digital which demonstrates the council processes in place to meet the requirements of the NHS's data protection standards and sharing arrangements. The submission for 2024 was completed in June with 'standards met'.</li><li>Annual mandatory data protection and cyber security training is entrained for all staff.</li><li>Compliance with the Council's data retention policy, which is reviewed regularly.</li><li>Improved performance and monitoring arrangements for compliance with FOI and SAR responses.</li><li>The Governance team report on performance to the IG Board and to Leadership Team on a quarterly basis. The latest statistics show that compliance continues to improve. The measures put in place in by the Council's Information Governance Team are working and need to continue and be built upon.</li><li>Review of existing internal and public facing policy suite and IG framework. Report submitted to SLT in December 2023 and approved at Cabinet in January 2024.</li><li>Updates to Council website and guidance on routes to access information and personal data. Privacy notice reviewed and updated. Transparency code compliance reviewed and new page on the intranet created with the relevant links.</li><li>Implemented the email retention policy, and automatic retention is now in place.</li></ul> <p><b>Further Actions</b></p> <ul style="list-style-type: none"><li>GDPR training undertaken with elected members during September-November 2024. Reminder communications issues on compliance. Sessions programmed for inclusion in induction following all out elections in May 2026.</li><li>Dialogue restarted with ACE Directorate to explore options for integrated customer feedback system with full functionality for management of FOIA/SAR/EIR requests with appropriate ringfence and restriction controls. Discussions at early stage and will require full business case, evaluation, approval gateways, procurement and mobilisation. 12-15 months window potentially. Adjustments and reconfiguration of existing DASH system to enhance operation and effectiveness.</li><li>Council Monitoring Officer has initiated a review of all practices, procedures and policies to ensure best practice is embedded to underpin assurance of compliance frameworks for IG.</li><li>Further improvement is still necessary in response times of FOI requests, with a target of 95% compliance which continues to impact on the current risk rating. Sustained performance of above 80% continues to be met meriting a minor reduction in the risk profile.</li><li>Further improvement required in corporate compliance with disclosure requests and SARs. Refresh of existing training and guidance materials in progress, updates cascaded through IGB.</li><li>Development of pro-active publication website to expand beyond disclosure log for FOIA to pre-emptively publish information of public interest prior to request, to improve transparency and reduce volumes of FOIA requests.</li><li>Additional assurance gateways to verify sources of information in responses prior to final review and authorisation. Dual step notification of relevant Executive Directors/Directors and Communications pre-publication to ensure full awareness and input into final responses when assessed as strategic.</li></ul> <p>Compliance and performance rates are subject to ongoing review with additional support and intervention offered to service areas or directorates should performance fall below an 80% threshold of compliance. It is not anticipated that the level of risk will subside further below an amber rating as sustained performance and compliance is required which can be impacted by operational and legislative factors, and remains subject to ongoing close oversight and intervention as required to assure performance is maintained.</p>	<p><b>1<sup>st</sup> line</b></p> <p>Information Champions Data Protection Officer Information asset registers Information incident log</p> <p><b>2<sup>nd</sup> line</b></p> <p>Information Governance Board Performance data on compliance with FOI and SAR responses to Leadership Team and directors FOIA disclosure log</p> <p><b>3<sup>rd</sup> line</b></p> <p>Information Commissioner's Office Internal Audit reviews First Tier Tribunal decisions</p>
4	<p><b>Cyber Security</b></p> <p>The public sector continues to be the target of significant, sophisticated and increasingly frequent cyber-attack with these intent on causing service disruption or disclosure of sensitive data. If the council does not invest additional and sufficient financial resources into a cyber security resilience programme, then it will remain at significant exposure of receiving a successful cyber-attack. The consequences will be:</p> <ul style="list-style-type: none"><li>The inability of the council and SCT to deliver some or all services, particularly critical services for a significant period of time, ranging from days to months</li><li>The loss of corporate and sensitive personal data (including bank details)</li><li>Enforcement action</li></ul>	12 (red)		12 (red)	12 (red)**	<p><b>Current and Ongoing Controls</b></p> <ul style="list-style-type: none"><li>Participation in national cyber resilience programmes run by organisations such as MHCLG, LGA and the NCSC</li><li>Close collaboration between the ICT Service and the council's Information Governance Team to develop a holistic approach to information protection.</li><li>Appropriate technical controls to protect the council's network perimeter and information assets.</li><li>Updates and progress reports as requested to the Leadership Team and Corporate Scrutiny Board.</li><li>Training for all staff through the implementation of the annual online training.</li><li>Regular communications continue to be sent to employees pertaining to protecting themselves and the council from emerging and new cyber security threats.</li><li>Attendance at national CTAG forum, MHCLG cyber clinics and West Midlands Warning, Advice and Reporting Point (WARP) where members can receive and share up-to-date advice on information security threats, incidents and solutions.</li><li>Subscription to relevant cyber intelligence threat reports providing early warning of emerging threats, vulnerabilities and trends.</li><li>Use of the Active Cyber Defence and Early Warning tools provided by the National Cyber Security Centre.</li><li>An ongoing programme addressing the retirement and upgrade of obsolete and unsupported technology platforms.</li><li>Annual ICT Health Check and Network Penetration Test</li><li>Implementation of a 3<sup>rd</sup> party managed Security Operations Centre to detect potential threats within the council's ICT environment providing timely alerts 24 hours a day.</li><li>Cyber Resilience Governance Board as part of ICT governance arrangements</li><li>Uplift of Microsoft Enterprise Agreement Licensing to Enterprise 5 (E5) at anniversary date which includes a full suite of security and compliance tools.</li><li>Reprofile remaining cyber budget following one-off saving due to identified budget pressure.</li><li>Development and maintenance of incident playbooks to activate in response to adverse cyber activity.</li><li>Use of vulnerability monitoring tools</li><li>Redefined governance structure to provide oversight of ongoing improvement programme following allocation of additional cyber funding.</li><li>CDDO Approve scanning and monitoring.</li></ul> <p><b>Further actions</b></p> <p>* **The mitigating actions are required to help protect against the current risk materialising. However, as the threat of this risk will continue to evolve and increase, even after such mitigations, this may still result in the ongoing risk remaining at a similar level.</p>	<p><b>1<sup>st</sup> line</b></p> <p>Self- assessment against cyber principles</p> <p><b>2<sup>nd</sup> line</b></p> <p>Cyber Board</p> <p><b>3<sup>rd</sup> line</b></p> <p>LGA Cyber Assessment NHS Digital PSN certification Audit and Risk Assurance Committee risk review Internal Audit review</p>

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	<ul style="list-style-type: none"><li>Significant financial loss</li><li>Employee stress; and</li><li>Reputational damage</li></ul> <p>Additionally, the council will be:</p> <ul style="list-style-type: none"><li>Unable to meet sector defined standards and compliance for cyber resilience e.g. PSN, CAF, PCI-DSS</li><li>Unable to share and collaborate with partner organisations in a joined-up manner as the council will not be viewed as a trusted partner</li></ul> <p>Risk Area – Finance and Transformation</p> <p>Risk Owner – Alex Thompson, Executive Director of Finance and Transformation</p> <p>Cabinet Member: Councillor Kerrie Carmichael, Leader of the Council</p> <p><b>Objectives impacted: All</b></p>					<ul style="list-style-type: none"><li>Adopt the NCSC Cyber Assessment Framework (CAF) as a methodology across the public sector for demonstrating adequate and consistent cyber hygiene (Joined Get CAF Ready programme and further work will continue into 2025 and 2026 in line with the National Cyber Security Strategy.</li><li>Develop a PCI-DSS improvement programme to identify the gaps in compliance across all council credit and debit card payment channels - April 2025</li><li>PSN resubmission - March 2025</li><li>To explore the possibility of any LGA Cyber 360 review and reprofiled Cyber Resilience Improvement Programme</li><li>To explore undertaking a Business Continuity Reaction Exercise in conjunction with any LGA service offer Programme</li><li>Council endorsement of a corporate cyber resilience strategy - April 2025</li><li>Appointment of initially an interim cyber lead to assist with the development of the cyber resilience strategy and overall improvement plan - March 2025</li><li>Implementation of E5 security tools - March 2025</li><li>Review of data backup solution – both on premise data and in the cloud - September 2025</li></ul>	
5	<p><b>Regeneration Fund Programmes</b></p> <p>If the council does not manage the programmes to ensure that all projects are delivered to scope, time and budget, then this could result in financial implications, the inability to regenerate our town centres, create sustainable economic growth and create long term economic prosperity and also reputational harm to the council.</p> <p>Risk area- Place</p> <p>Risk owner – Alan Lunt, Executive Director – Place</p> <p>Cabinet Member: Councillor Peter Hughes</p> <p><b>Objectives impacted – 2, 3, 4, 5 and 6</b></p>	6 (green)		6 (green)	4 (green)  Programme completion of all projects and delivery of intended outcomes	<p>This risk sets out the next phase of the Regeneration Fund Programmes.</p> <p>Towns Fund (approval received by the council for all 16 business cases that were submitted as part of the approved TIPs).</p> <p><b>Current and Ongoing Controls</b></p> <ul style="list-style-type: none"><li>Robust governance in place to oversee the programme throughout the delivery phase including three Town Deal Boards (one per Town Deal Area), that have inherited Superboard roles and responsibilities. Revised governance arrangements for Delivery Phase were reviewed and approved by Cabinet in May 2022.</li><li>The council is the Accountable Body for the Town Deal funding. The Assistant Director – Spatial Planning and Growth chairs a Towns Fund Programme Board (which is also attended by the Director of Finance/ representative and officers from procurement and legal as well as all project leads) to review risks and provide a forum for resolution of issues, as well as seeking assurances on the management of risk.</li><li>Fortnightly engagement with advisors from MHCLG</li><li>Programme management arrangements in place including appointment of a permanent programme manager, programme support officer, dedicated monitoring officer resource, programme risk register and project risk registers for agreed business cases, which are updated quarterly.</li></ul> <p><b>Further Actions</b></p> <ul style="list-style-type: none"><li>Ongoing implementation of delivery phase of projects and programme plan.</li><li>Ongoing reviews of financial profiles to manage supply chain issues and implications of cost inflation.</li></ul> <p>Levelling Up Partnership</p> <p><b>Current and Ongoing Controls</b></p> <ul style="list-style-type: none"><li>Robust governance in place to oversee the LUP programme via the Wednesbury LUP Board. Governance arrangements agreed by Cabinet in September 2023.</li><li>The council is the Accountable Body for the LUP funding. The Assistant Director – Spatial Planning and Growth chairs a LUP Programme Board (which is also attended by representatives from Finance, procurement, and legal as well as all project leads) to review risks and provide a forum for resolution of issues, as well as seeking assurances on the management of risk.</li><li>Monthly engagement with advisors from MHCLG with regional representatives attending the LUP Board.</li><li>Programme management arrangements in place including appointment of a temporary programme manager to oversee the delivery phase and a programme support officer. Programme and project risk registers are in place.</li><li>Reporting to Leadership Team Quarterly.</li><li>All LUP projects have undergone a capital appraisal as part of the Council's assurance processes and have been approved subject to recommendations.</li><li>Agreement in place with MHCLG for the council to manage the grant within the Council's overall capital programme to enable spend beyond the March 2025 grant deadline. Any project spend beyond March 2025 will be considered and authorised by the Council as Accountable Body,</li></ul> <p><b>Further Actions</b></p> <ul style="list-style-type: none"><li>Implement delivery phase of projects and programme plan.</li><li>Ongoing reviews of financial profiles to manage supply chain issues and implications of cost inflation.</li><li>Agree remediation and permitting strategy for Friar Park development with Environment Agency</li><li>Commence planning process in relation to Friar Park remediation</li></ul>	<p><b>1<sup>st</sup> line</b></p> <p>Town Deal Boards</p> <p><b>2<sup>nd</sup> line</b></p> <p>Scrutiny Reviews</p> <p>Monitoring and reporting of outcome indicators, with processes in place to manage changes and risks during delivery stage.</p> <p><b>3<sup>rd</sup> line</b></p> <p>Ministry of Housing, Communities and Local Government (MHCLG)</p>



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6	<p><b>Customer Experience</b></p> <p>Failure to provide a consistent, co-ordinated and efficient standard of service to customers in line with our Values and Behaviours. Contacts could result in sub-standard responses creating frustration for customers and repeat requests. The consequences of this could result in customers not engaging with important services or failure demand creating more expensive responses and diverting resources away from first time resolution of service requests.</p> <p>Risk area – All Council Services Risk owner – James McLaughlin, Assistant Chief Executive Cabinet Member: Councillor Paul Moore</p> <p><b>Objectives impacted - All</b></p>	9 (amber)		8 (amber)	8 (amber) March 2025	<p><b>Current and Ongoing Controls</b></p> <ul style="list-style-type: none"> <li>New operating model for council employees is well embedded across all service areas.</li> <li>Key priority within the Corporate Transformation Programme.</li> <li>Regular discussions and focus sessions have taken place at Strategic Leadership Team to address concerns and issues. Also, a priority for Performance Board.</li> <li>A new telephony system will be implemented in the spring of 2025</li> <li>The MySandwell offer is continuously being developed.</li> <li>Collection of Customer Satisfaction data is continuously being looked at and new methods trialled.</li> <li>The four main Workstreams are: <ul style="list-style-type: none"> <li>Development of a Customer Experience Strategy 2024-2027 (to be approved in winter/spring 2025)</li> <li>Review of Contact Centres, as required by Medium Term Financial Strategy commitments</li> <li>Review of the One Stop Shop and exploration of a Community Hubs offer for face to face services in each Town.</li> <li>Technology – review of all Customer related technology &amp; identification of any gaps: procure delivery partner to replace the Council's telephony system (achieved).</li> </ul> </li> <li>Pilot local hub concept in two areas of the Borough - in progress in West Bromwich and Blackheath and to be extended for a further twelve months.</li> <li>Delivery of bespoke Customer Services Training for front facing roles across the Council during autumn and winter 2024/25</li> <li>Leadership and Management Conference set out clarity on quality and consistency of customer services</li> <li>New Customer Service Standards developed and to be rolled out to all staff linked to Values and Behaviours</li> </ul> <p><b>Further Actions</b></p> <ul style="list-style-type: none"> <li>Continued stakeholder engagement, in particular within the One Stop Shop (Ongoing).</li> <li>Additional capacity and resources to be identified to meet current demand for face-to-face services.</li> <li>Budget and Corporate Scrutiny Management Board is looking at the customer journey as part of its current work programme (24/25).</li> <li>Review of approach to Digital Working within the Council leading to a Digital Strategy (covering digital inclusion also)</li> <li>Directorate Leadership Teams to regularly review customer experience.</li> </ul>	<p><b>1<sup>st</sup> line</b></p> <p>Incorporate recent recommendations from Budget and Corporate Scrutiny into the Customer Journey Action Plan</p> <p><b>2<sup>nd</sup> line</b></p> <p>Customer satisfaction survey Customer compliments and complaints system Budget and Corporate Scrutiny Board Review Monitoring, reporting &amp; governance through the Customer Journey Programme Board which will report in to the Corporate Transformation Office and to the Cabinet Member Quarterly reports to Strategic Leadership Team on Member Portal performance. Customer Feedback Annual Report</p> <p><b>3<sup>rd</sup> line</b></p> <p>Local Government Ombudsman report</p>
7	<p><b>Equalities</b></p> <p>If the council fails to meet its legal obligations in respect of the Equality Act 2010 and the Public Sector Equality Duty ensuring fairness is adhered to and is unable to demonstrate and evidence compliance with its obligations, then this will result in potential legal consequences for non compliance, reputational harm to the council as well as potential impact on recruitment and retention.</p> <p>Risk area – All Council Services Risk owner – James McLaughlin, Assistant Chief Executive Cabinet Member: Councillor Kerrie Carmichael, Leader of the Council</p> <p><b>Objectives impacted - 5</b></p>	8 (amber)		8 (amber)	6 (green)	<p><b>Current and Ongoing Controls</b></p> <ul style="list-style-type: none"> <li>An Equality Diversity and Inclusion Commission has been set up with agreed Terms of Reference ad is chaired by the Leader of the council.</li> <li>Six staff networks (Age Smart, Disability, Ethnic Minority, Frontline Workers, LGBTQ+ and Women) have been established and SLT has agreed to protected time for Co-Chairs to develop the networks.</li> <li>A review of the Equality policy has been completed and was launched in December 2022, following Cabinet approval.</li> <li>Equality impact assessment toolkit and guidance was issued and launched in December 2022 and drop-in clinics taking place to ensure the council's consultations and decision making will withstand scrutiny.</li> <li>An action plan has been developed based on feedback provided by employees across the council along with gaps identified in the workforce diversity data as well as best practice put forward by other public-sector organisations.</li> <li>A robust governance framework to help monitor and review the objectives and actions in the plan is also in place.</li> <li>An Equalities Calendar has been developed and implemented that details many EDI events to raise awareness of the agenda.</li> <li>Various events such as Black History Month, LGBTQ+ History Month have been successfully delivered leading to improved awareness and understanding.</li> <li>The LGA Equality Framework has been approved for use by Cabinet will be used to develop the council's first EDI Single Framework Strategy.</li> <li>Refresh of the council's Equality Objective was published in March 2023</li> <li>An EDI Audit based on the LGA Equality Framework has been undertaken. An EDI action plan has been developed to enable the Council to respond to the findings of the audit.</li> <li>We have prepared a Public Sector Equality Duty (PSED) service user report.</li> <li>EDI E-Learning Module launched in August 2024.</li> </ul> <p><b>Further actions</b></p> <ul style="list-style-type: none"> <li>EDI Strategy to be developed by June 2025, based on the LGA Equality Framework</li> <li>Governance for EDI to be reviewed, including the role of the Staff Networks and the EDI Commission</li> <li>Ensure that EDI is embedded within the “Engine Room” of the Council by resources being located within HR and Service Improvement</li> <li>Engage with WMCA Equality Taskforce and specific work commissioned through the WM Mayor</li> </ul>	<p><b>1<sup>st</sup> line</b></p> <p>Employee Engagement Survey 2022</p> <p><b>2<sup>nd</sup> line</b></p> <p><a href="#">Sandwell Equalities Commission</a></p> <p><b>3<sup>rd</sup> line</b></p> <p>LGA Peer Review</p>
8	<p><b>Climate Change</b></p> <p>Failure to achieve the council's commitments in relation to Climate Change, including the pledge to make council activities, buildings, housing, fleet, schools and street lighting net-zero carbon by 2030 may result in:</p> <ul style="list-style-type: none"> <li>reputational damage</li> <li>financial impact</li> <li>increased demand for council resources (in the event of extreme weather) and</li> <li>a loss in public confidence.</li> </ul>	12 (red)		12 (red)	<p>8 (amber) 2025 - Update Action Plan Monitoring Tool and provide GAP analysis</p> <p>2025 – Review and update Climate Change Strategy and Action Plan along with updating</p>	<p><b>Current and Ongoing Controls</b></p> <ul style="list-style-type: none"> <li>Climate Change strategy 2020-2041 in place which sets out the 2030 target for the council.</li> <li>Member steering group to oversee implementation of the climate change action plan.</li> <li>Climate change champions in place (officer level) and a Cabinet Member and member advisor champions in place.</li> <li>An action plan for implementing the strategy was approved by Cabinet in March 2022.</li> <li>Establishment of programme governance arrangements, including the Cabinet approval to the appointment of cross-party membership to the Climate Change Committee to monitor the implementation of the action plan, A Climate Change Programme Board (represented by service managers from across the council) is leading on measures within the action plan.</li> <li>Draft action plan monitoring tool has now been established following an internal audit report. This document is owned by the Climate Change Team and is currently being populated in conjunction with the relevant owners of each action across the various Council service areas. The monitoring tool will form the basis of future Climate Change Programme Boards and Member Steering Groups to appropriately track delivery of the Climate Change Strategy Actions and to allow costs (where applicable) to be provided for their implementation. This will also be presented annually to Cabinet for information.</li> </ul> <p><b>Further Actions</b></p> <ul style="list-style-type: none"> <li>Gap analysis to be conducted to assess the councils' ability to implement the action plan, followed by a report on available options which will be addressed in 2024/25.</li> </ul>	<p><b>1<sup>st</sup> line</b></p> <p>Climate Change Strategy 2020-2042 Climate Change Improvement Plan</p> <p><b>2<sup>nd</sup> line</b></p> <p>Climate Change Programme Board Member Steering Group</p> <p><b>3<sup>rd</sup> line</b></p> <p>2023 Internal Audit Report – Limited Assurance</p>

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	<p>In addition, managing the effects of climate change will also have significant financial impact which the council will need to address.</p> <p>Risk Area – All Services</p> <p>Risk Owner – Alan Lunt, Executive Director – Place</p> <p>Cabinet Member: Councillor Keith Allcock</p> <p><b>Objectives impacted: All</b></p>				<p>board membership / Terms of Reference</p> <p>2030 – Target date for Council to become Net Zero</p>	<ul style="list-style-type: none"> <li>To undertake stock condition surveys to enhance our understanding of investment needs and costs to achieve net-zero targets in our social housing stock and to inform future revisions of the HRA business plan and opportunities to draw in external investment. This is currently a budget pressure risk.</li> <li>Consideration of adapting works and activities to ensure that contractor selection, works methods and materials used are aligned and contribute to the climate change strategy.</li> <li>Explore funding models for retrofit of council and other homes in the Borough e.g. attend MIPIM investors conference / WMCA Devolution Deal with Government in negotiation.</li> <li>To implement the Asset Management Strategy approved by Cabinet in November 2022 which seeks to significantly rationalise the Councils buildings and assets.</li> <li>To establish EV charging infrastructure via ULEV programme (on street) and council operational locations so that relevant Council fleet can transition to EV over the next 3 years– in progress.</li> <li>To develop a policy on Single Use Plastics that is consistent with the national emerging policy. This has been presented to Leadership Team and Cabinet Members and approved at Cabinet in January 2024.</li> <li>Roll out Carbon Literacy Training to all elected Members, relevant officers and Climate Change Champions. A number of sessions have been undertaken in 2023 with final sessions having been conducted for all outstanding persons in early 2024.</li> <li>Refresh of the Climate Change Board to be undertaken having been presented to Leadership Team in 2024.</li> <li>Climate Change Action Plan to be updated by expiry of current version in 2025.</li> <li>The delivery of the action plan is the key measure that determines the current risk assessment. The deliverability of the Plan is heavily dependent upon future government initiatives and the availability of financial resources which will be the key driver in achieving the council's 2030 target.</li> </ul>	
9	<p><b>Workforce Recruitment</b></p> <p>The council is required to recruit a skilled, qualified and experienced workforce in order to provide and deliver services to Sandwell residents. If the council is unable to recruit its workforce and deliver its statutory obligations to meet the needs of the community this could result in loss of reputation, penalties, litigation and in some cases imprisonment.</p> <p>Risk area – All council services</p> <p>Risk owner – James McLaughlin, Assistant Chief Executive</p> <p>Cabinet Member: Councillor Paul Moore</p> <p><b>Objectives impacted: All</b></p>	9 (amber)		9 (amber)	6 (green) March 2025	<p>The risk concerns issues are largely a reflection of the regional and national position also and not unique to the council, as supported by the LGA workforce survey completed in 2022. The target risk score was initially to be reached by March 2023. However, this has been put back in order to allow the recruitment strategy to be agreed and fully embedded, and until results over the mid-term are known.</p> <p><b>Current and Ongoing Controls:</b></p> <ul style="list-style-type: none"> <li>Adoption of People Strategy and communication of ambition for the workforce, aligned to the Council Plan and Values and Behaviours, accompanied by annual delivery plans for each year.</li> <li>Recruitment microsite (We Are Sandwell) has been launched on WM Jobs and is consistent with corporate branding approach to maximise impact on candidate attraction.</li> <li>Directorates to continue to undertake comprehensive workforce planning at least annually, as part of business planning processes, with a focus on creating and nurturing talent pipelines.</li> <li>Recruitment and selection refresher training for hiring managers in order to share best practice in recruiting qualified and skilled employees.</li> <li>Pre-employment checks are carried out in line with requirements for the job role including any statutory requirements.</li> <li>Regular 121 meetings (supervision) and annual appraisal process is in place to ensure employees are engaged and can raise any concerns.</li> <li>Regular employment engagement (full) and pulse surveys are undertaken, and plans are developed and implemented to address any areas requiring further action.</li> <li>Pay benchmarking to ensure the council is competitive relative to the relevant job market in sectors where there are specific and critical challenges to recruitment and retention.</li> <li>Resourcing Team active engagement in regional and wider attraction campaigns.</li> <li>NGDP Graduates undertaking project to review how the Council can become an 'employer of choice' for young people and make recommendations for change.</li> <li>Introduce and extend talent pools and open-ended recruitment campaigns to high turnover areas - this will form part of the recruitment strategy which is underway.</li> <li>Review and extend advertising, to include focus on attraction of diverse applicants – again this will form part of the recruitment strategy.</li> <li>Review of our long-term use of a neutral vendor agency provision where we are unable to fill roles to deliver a service to our residents.</li> </ul> <p>Further Actions:</p> <ul style="list-style-type: none"> <li>Develop and provide management reports and Directorate level down reports to identify clearer picture of recruitment and turnover data at a more detailed level</li> <li>Implement recommendations of Graduate Project on attraction (young people focus)</li> <li>Continue to develop our recruitment microsite and link with wider LGA recruitment campaign to attract people into local government</li> <li>Work experience placements to be linked to workforce planning priorities where possible to attract young people into shortage professions</li> <li>Directorate Leadership Teams to plan coordinated work experience placement activity to make the Council more attractive for such experience.</li> </ul>	<p><b>1<sup>st</sup> line</b></p> <p>Pulse surveys</p> <p>HR related KPIs and data</p> <p>Appraisal process</p> <p><b>2<sup>nd</sup> line</b></p> <p>Employee Engagement Survey</p> <p>Benchmarking analysis</p> <p><b>3<sup>rd</sup> line</b></p> <p>LGA <a href="#">Workforce Survey 2022</a></p>
10	<p><b>Borough Archives</b></p> <p>Failure to achieve the National Archives Accreditation could lead to withdrawal of 'Place of Deposit Status'. This will cause reputational damage and incur costs as public records will be stored in another location, which accrues a cost to the council and creates difficulties around access to the records. Accreditation cannot be achieved without alternative accommodation that meets the required British Standard.</p> <p>Risk area – All council services</p> <p>Risk owner – Alan Lunt, Executive Director - Place</p>	9 (amber)		9 (amber)	8 (amber)	<p><b>Current and Ongoing Controls</b></p> <ul style="list-style-type: none"> <li>Public records are stored at Dudley archives which meets the required standard (BS EN 16893). However, this can only be a temporary measure, as Dudley's own archives increase, and they will require the space currently occupied by Sandwell.</li> <li>A feasibility study has been completed and a replacement archive solution for Sandwell's archives has been identified and was approved by <a href="#">Cabinet</a> in November 2022.</li> <li>A New Qualified Archivist is now appointed and in place. The Business Manager – Museums and Archives is also a qualified archivist.</li> <li>Previous discussions with The National Archives (TNA) around delaying an application for accreditation as it would fail have moved on and we have now been encouraged to apply. We could only expect to achieve partial accreditation though, due to the accommodation.</li> <li>Second stage of feasibility that includes design, specification, and costs now complete. The development of a funding strategy supported by an archives funding specialist will follow which was approved by Cabinet in February 2024. This will enable submissions to be made to external funders with this currently being prepared.</li> </ul> <p><b>Further Actions</b></p> <ul style="list-style-type: none"> <li>Funding sources for cost of capital to build the archives needs to be identified and agreed.</li> <li>Some corporate capital will also need to be identified as part of the funding strategy with £3million now agreed as part of the corporate capital pipeline.</li> <li>A bid to Arts Council England and others to be considered for contribution to the cost of capital, once the funding strategy has been agreed.</li> <li>A design feasibility is currently being progressed to support the relocation of the Archives into Smethwick Council House prior to the construction of a new Archives Centre.</li> </ul>	<p><b>1<sup>st</sup> line</b></p> <p>Feasibility Study</p> <p><b>2<sup>nd</sup> line</b></p> <p>Cabinet approval of replacement archive solution</p> <p><b>3<sup>rd</sup> line</b></p> <p>The National Archives</p> <p>Archive Service accreditation</p>

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	Cabinet Member: Councillor Suzanne Hartwell <b>Objectives impacted: All</b>						
11	<b>Electoral arrangements</b> The Elections Act 2022 introduced a range of changes over recent years including the ability for voters to apply for absent votes on-line and arrangements for postal votes. There remain a series of technical and operational issues that are being explored nationally, with there being a concern over the readiness of new systems which will continue over the coming years through further adjustments to processes and legislative requirements for elections. Should the Returning Officer be unable to implement any legislative, regulatory or procedural requirements associated with the conduct of elections, this could result in low voter confidence and some voters may be dis-enfranchised leading to a lack of confidence in election results.  Risk area – All council services Risk owner – Mike Jones, Assistant Director – Legal and Assurance Cabinet Member: Councillor Kerrie Carmichael, Leader of the Council <b>Objectives impacted: All</b>	8 (amber)		8 (amber)	4 (green) Sept 2025	<b>Current and Ongoing Controls</b> <ul style="list-style-type: none"><li>Significant experience has been gained through recent local, combined authority mayoral, police and crime commissioner and national general elections held during the period May to July 2024 which are embedded into practice and procedure guidelines and training materials.</li><li>A One Council approach is being taken in order that the wider council can provide necessary support.</li><li>The Electoral Commission continue to undertake much of the communication, but the Returning Officer needs to consider the demographics and harder to reach parts of the electorate and the support that they will require.</li><li>There is a review of polling stations to see which ones are suitable and unsuitable.</li><li>Robust and updated training programme will be in place for all polling inspectors and presiding officers.</li><li>Job roles for election staff are being updated to provide clarification on what is required and to assist in arriving at the correct fee.</li><li>The Electoral Services Manager is part of the Business Change Network facilitated by the Cabinet Office and consequently is very well informed.</li><li>Privacy ID booths provided to every polling station to reduce the need for a specific place. This will be private but still in the “voting room”.</li><li>Awareness Campaign and media campaigns to promote current and any subsequent emergent Voter ID requirements to compliment national campaigns by the Electoral Commission.</li><li>Regular briefings with members undertaken during recent local, regional and national elections.</li><li>Regular networking meetings taking place relevant internal stakeholders including Executive Director, Service Director, Assistant Director and Manager as required.</li><li>Capacity and resourcing options are being explored and subject to continuous review.</li></ul> <b>Further Actions</b> The Monitoring Officer and Elections Manager will continue to review national sector best practice guidance and emergent legislative information and provide regular updates to the Returning Officer and key stakeholders on the impacts of additional requirements. Borough-wide all-out elections will be undertaken in May 2026 following the completion of a review of local ward arrangements and boundaries by the Local Government Boundary Commission for England. These will require a full review of polling districts prior to implementation. A comprehensive delivery plan will be developed to ensure the robust and effective delivery of compliant elections for 2026.	<b>1<sup>st</sup> line</b> Elections Returning Officer Deputy Returning Officers Monitoring Officer Elections Service Manager  <b>2<sup>nd</sup> line</b> Polling station inspectors  <b>3<sup>rd</sup> line</b> Electoral Commission
12	<b>Sandwell Local Plan</b> Failure to prepare and adopt a Local Plan within the timescales required could result in Government intervention in the operation of the planning service and in the decision-making process for planning applications resulting in a loss of local democratic oversight.  Risk area - Regeneration Risk Owner – Alan Lunt, Executive Director – Place Cabinet Member: Councillor Peter Hughes <b>Objectives impacted: All</b>	6 (green)		6 (green)	4 (green) March 2025	Having an up-to-date Local Plan is a statutory requirement. Conformity with an up-to-date Local Plan is often a prerequisite for Government regeneration funding. Following the halting of the Black Country Plan, Cabinet approved the preparation of the Sandwell local Plan on 16 November 2022. The process to adoption involves several rounds of public consultation and political approvals as well as an independent Examination in Public. Recently announced planning reforms involve changes to how Local Plans are prepared. Transition arrangements have been put in place for plans already well advanced and Sandwell is able to continue under these arrangements. The Sandwell Local Plan was submitted to the Secretary of State for Examination in Public in line with programme on 11th December 2024. The timetable envisages the Examination being in the first half of 2025 with adoption in late 2025. We remain on target to achieve this. <b>Current and Ongoing Controls</b> <ul style="list-style-type: none"><li>Members regularly briefed on key and up to date issues. Informing of facts and evidence based.</li><li>Project Manager recruited to lead on the delivery of the Sandwell Plan (fixed term post to Dec 2026).</li><li>Additional revenue budget secured to deliver the Sandwell Plan (Cabinet Report Dec 2022).</li><li>Activities monitored against agreed programme and reported to Leadership Team quarterly - consultation on draft Sandwell Local Plan completed in line with programme.</li><li>Consultation on Publication Plan (the final version) is scheduled for September to November 2024 in line with the programme.</li></ul> <b>Further Actions</b> <ul style="list-style-type: none"><li>Quarterly update reports to Leadership Team</li><li>Ensure the Plan conforms with emerging Government planning regulations where relevant.</li></ul>	<b>1<sup>st</sup> line</b> Appointment of dedicated project manager  <b>2<sup>nd</sup> line</b> Regular updates to Leadership Team, Cabinet Member for Regeneration and Cabinet as appropriate. <b>3<sup>rd</sup> Line</b> Ongoing review of conformity with emerging Government planning reforms.
13	<b>Organisational culture</b> If the council does not have an effective organisational culture, then this could result in: <ul style="list-style-type: none"><li>Poor officer and member relationships</li><li>Negative impact on employee engagement</li><li>Inability to demonstrate effective people management,</li><li>Weak diversity and inclusion practices</li></ul>	8 (amber)		8 (amber)	4 (green) March 2025	<b>Current and Ongoing Controls</b> <ul style="list-style-type: none"><li>Regular meetings in place between senior members and officers to develop positive working relationships and information sharing.</li><li>LGA training on officer/member relationships delivered in September 2022 and early 2024.</li><li>Launch of One Team Framework (values and behaviours) including Staff Conference and Managers workshops</li><li>Employee Engagement Survey 2022 results disseminated and discussed at Directorate Management Teams and team meetings - action plans developed and monitored at Leadership Team.</li><li>Employee Engagement Survey 2023 results disseminated and discussed at Directorate Management Teams – actions to address themes incorporated into People Strategy and service business plans.</li><li>Cabinet and Strategic Leadership Team Away Days arranged quarterly.</li><li>New Council Plan and People Strategy launched in July 2024</li></ul> <b>Further Actions</b>	<b>1<sup>st</sup> line</b> One Team Framework  <b>2<sup>nd</sup> line</b> Employee Engagement Survey  <b>3<sup>rd</sup> line</b> External Reviews (Grant Thornton and LGA) providing assurance that organisational culture change has started to occur.

Risk Ref	Risk Title and Description	Previous score (Sept 2024)	Movement in risk score	Current risk score (Jan 2025)	Target risk score and date	Progress to Date  (incl. current risk mitigating controls and further actions to be taken to manage risk and action date)	Key Sources of Assurance  (3 lines of defence)
	<ul style="list-style-type: none"> <li>Recruitment and retention issues</li> <li>Negative impact on the delivery of the improvement plan and</li> <li>Potential for extended government intervention</li> <li>Failure to deliver the corporate plan</li> <li>Reputational damage</li> <li>Missed opportunities for continuous improvement</li> </ul> <p>Risk area – All council services</p> <p>Risk owner – James McLaughlin, Assistant Chief Executive</p> <p>Cabinet Member: Councillor Kerrie Carmichael, Leader of the Council</p> <p><b>Objectives impacted: All</b></p>					<ul style="list-style-type: none"> <li>Embedding One Team Framework Approval of Workforce Strategy.</li> <li>Mechanisms to be identified for ongoing insight and assurance around health of Officer and Member Relationship</li> <li>New Management Conference to be arranged for 400+ managers across the council.</li> <li>We Are Sandwell Awards</li> <li>New Neighbourhoods Model to be implemented in early 2025 which will improve Members' access to officers on the ground to get things done.</li> <li>Targeted Management and Leadership Development programmes for women, minority communities and disability to be established</li> </ul>	
14	<p><b>Strategic Workforce Development for Adult Social Care Recruitment, Retention and Sickness Absence</b></p> <p>A workforce strategy is in place and links directly with workforce planning and training. This offers existing staff training opportunities to ensure that they are qualified and competent to face service needs. If recruitment and retention are not prioritised within the service and amongst service providers, then there will not be the skilled staff to deliver appropriate social care.</p> <p>Risk Area – Adult Social Care</p> <p>Risk Owner – Rashpal Bishop, Director of Adult Social Care</p> <p>Cabinet Member: Councillor Jackie Taylor</p> <p><b>Objectives impacted: 2</b></p>	12 (red)		12 (red)	8 (amber) June 2025	<p><b>Current and Ongoing Controls</b></p> <ul style="list-style-type: none"> <li>ASC Workforce Strategy approved by the ASC Transformation Board in January 2024.</li> <li>The Core Workforce Delivery Group has been established.</li> <li>Workforce Workshop held in January 2024.</li> <li>Recruitment Events held.</li> <li>An Occupational Therapist student programme with Worcestershire University is in place and works to secure university placements including access to Practice Educator training for SMBC Occupational Therapist 's to retain their skills and expertise.</li> <li>A student programme and the Assessed and Supported Year in Employment for Social Workers is in place.</li> <li>Apprenticeships within the Directorate utilising the Apprenticeship Levy to access accredited qualifications.</li> <li>An apprenticeship programme for social work is in place with Warwickshire University, a similar programme for Occupational Therapy is being developed with Wolverhampton University.</li> <li>Qualification Sponsorship scheme to support employees to obtain recognised qualifications to enhance their work performance and skills.</li> <li>Work around maintaining recruitment and retention: Phase 1 - A) Pay benchmarking B) Golden Hello C) Market Supplement completed.</li> <li>Regular 121 meetings (supervision) and annual appraisal process is in place to ensure employees are engaged and can raise any concerns.</li> <li>Implemented Adult Social Care restructure for social work and therapy to deliver a career development pathway which will support retention, career development and succession planning within social work.</li> <li>Plans are developed and implemented to address any areas requiring further action from the employee engagement survey.</li> <li>ASC branding for our unique selling point in place.</li> <li>Recruitment campaign held and materials available for all to use on the intranet.</li> <li>Subgroups for recruitment, retention and learning and development are set up to define key actions to share with the Adult Social Care Transformation Board.</li> <li>Sickness Absence Monitoring and reporting on stage 3 cases.</li> <li>Monthly HR &amp; Management Sickness Absence Review Meetings.</li> <li>Employee Relations Meetings.</li> <li>Managers in regular welfare contact with employees and refer to occupational health where muscular/skeletal and stress, depression and mental health related absence.</li> <li>Implement adjustments to support staff back into work and undertake stress risk assessments.</li> <li>Managers / Staff encouraged to access the My Wellbeing Hub.</li> <li>The Wellbeing Specialist provided an update on Occupational Health and wellbeing support available to staff at the Operational Heads Meeting in May 2024 with an offer of coming out to team meetings if required.</li> <li>The Sickness Absence Task and Finish Group has been established and is currently operational. The group's objective is to conduct a comprehensive review to gain a deeper insight into the patterns and reasons for sickness absence within the Directorate. By examining the data on absences, the group aims to pinpoint the specific areas where the rates of absence are notably elevated.</li> </ul> <p><b>Further Actions</b></p> <ul style="list-style-type: none"> <li>Develop a workforce Action Plan - include external market.</li> <li>Recruitment Events (exploring opportunity for joint partnership recruitment with health colleagues).</li> <li>Succession planning for staff.</li> <li>Developing Career Pathway Routes.</li> <li>Ensure we use the recruitment materials on the ASC website.</li> <li>Considering other mediums for advertising i.e. social media for specific vacancies were currently unable to recruit to.</li> <li>Liaising with council's Occupational Health and Wellbeing specialists to arrange drop-in sessions for managers.</li> <li>Task and finish group to complete review and propose absence strategy for 2024/25 to Adult Social Care DMT. This will include recommendations for interventions and activities that fall within the gift of the group that may support improvements and reduce overall.</li> <li>A Wellbeing Event is to take place in January 2025 for all staff within Adult Social Care. There will be a wide variety of services stalls (internal and external). Support from our Occupational Health team to include flu vaccines, health checks. Two workshops to be held on the day along with small pampering kits for attendees.</li> </ul>	<p><b>1<sup>st</sup> line</b></p> <p>HR related KPIs and data</p> <p>Appraisal process</p> <p><b>2<sup>nd</sup> line</b></p> <p>Employee Engagement Survey</p> <p>National Minimum Data Set for social care</p> <p>Benchmarking analysis</p>

Risk Ref	Risk Title and Description	Previous score (Sept 2024)	Movement in risk score	Current risk score (Jan 2025)	Target risk score and date	Progress to Date  (incl. current risk mitigating controls and further actions to be taken to manage risk and action date)	Key Sources of Assurance  (3 lines of defence)																																							
15	<p><b>Medium Term Financial Strategy (MTFS), Central Government Funding and Resource Allocation</b></p> <p>Government may not provide timely resolution on the future plans for health and social care reforms, the Public Health grant, the Better Care Fund, the package of one-off social care grants, business rates reset and retention, and future years funding. One year funding settlements inhibit local authorities' from effectively managing medium term/ five-year financial plans.</p> <p>If the council is unable to plan effectively then this will impact on the council's financial resilience and its ability to effectively discharge its statutory responsibilities. Short term decisions may not achieve best value. This will impact on the council's ability to deliver sustainable services to the people of Sandwell.</p> <p>Risk Area – All Council Services Risk owner – Alex Thompson, Executive Director of Finance and Transformation Cabinet Member: Councillor Paul Moore <b>Objectives impacted: All</b></p>	*	*	*	*	<p>* There are a number of factors that underpin the wider risk score for this risk, and the score will continue to remain fluid throughout each 12-month cycle as the council develops its MTFS, generally in-line with the below pattern. However, overall the council is confident that it has processes in place in order to be able to adequately mitigate these risks, and that it will remain able to effectively discharge its statutory responsibilities, including the setting of a balanced budget for future years.</p> <table><tr><td></td><td>2025/26</td><td>2026/27</td><td>2027/28 Onwards</td></tr><tr><td>Delivery of the Medium-Term Financial Strategy (MTFS)</td><td></td><td></td><td></td></tr></table> <p><b>Current and Ongoing Controls</b></p> <ul style="list-style-type: none"><li>The most recent review by CIPFA that looked at financial resilience concluded that the council is financially stable and in recent years has been able to contribute towards reserves through achieving a balanced budget or an underspend. An underspend was delivered in 2022/23 and in 2023/24. A further underspend is forecast in 2024/25.</li><li>A fundamental review of the MTFS (in line with the CIPFA recommendations) was completed within 2023/24 to ensure that the council understood the challenges ahead and to ensure that the MTFS matches the ambitions of the corporate plan and regeneration plans for Sandwell.</li><li>A balanced budget for 2024/25 was approved by Council on 20<sup>th</sup> February 2024 and included savings totalling £19m.</li><li>Monthly monitoring of savings is carried out by Finance Business Partners in year. Savings are RAG rated and reported to Directors monthly through DMT meetings and to LT budget meetings.</li><li>Star Chamber meetings continue to be used to support budget setting. During August and September 2024, a Star Chamber meeting was held in relation to each Council portfolio area, focusing on the area's financial position, savings delivery within 2024/25, ongoing budget pressures and savings to be delivered in 2025/26. Star Chamber meetings include the Chief Executive and Portfolio Holders as well as the appropriate Director and Finance Business Partners. This process will be repeated annually.</li><li>Star Chamber meetings are used as the initiation process to generate further savings proposals for the following financial year and to test those proposals with elected members. This is the first step in the process towards balancing the budget for the following year.</li><li>Directorate budget pressures and growth are calculated annually by Finance Business Partners, and for Adult Social Care the process includes a growth model that extrapolates client numbers and average placement costs forward, building in assumed increases in market rates.</li><li>A Finance Strategy Manager post has been created, so that there is sufficient resource create and update the MTFS model and to ensue assumptions, eg, pay inflation assumptions, are calculated with consideration and in accordance with wider local authority group assumptions.</li><li>LG Futures have been commissioned to provide financial benchmarking data, including assumptions on grant income in future years,</li><li>Regular discussions take place with WMCA over the likelihood of when the business rates reset might transpire, and Sandwell's assumptions in this regard are aligned to the rest of the WMCA group of local authorities.</li><li>An MTFS officer working group, including the S151 Officer and Finance Strategy Manager, meets weekly to ensure that the timetable for development and production of the MTFS is in place and on-track. The timetable includes all communications and engagement activities.</li><li>The MTFS position was reported to, and discussed with, Leadership Team on several occasions during the Autumn of 2024, and Directors were fully engaged in the process of generating savings proposals to balance the budget gap in 2025/26. A budget timetable is in place for 2025/26 which includes regular sessions with Leadership Team and Wider Leadership Team, and consultation with key external partners.</li><li>Every savings proposal is supported by a business case document setting out how the saving will be delivered.</li><li>Several Cabinet workshops are being held during Autumn/Winter 2024/25 to engage Cabinet in the MTFS process and to ensure that elected members are willing to take each of the proposed savings forward for public consultation.</li><li>A further iteration of the MTFS will be produced following the Final Settlement, during February 2025.</li></ul> <p><b>Further Actions</b></p> <ul style="list-style-type: none"><li>Use of benchmarking data to help identify opportunities for efficiencies, savings and service improvements.</li><li>The council continues to horizon scan and consider the impacts of potential government initiatives and policies on future funding sources and demand for council services.</li></ul>		2025/26	2026/27	2027/28 Onwards	Delivery of the Medium-Term Financial Strategy (MTFS)				<p><b>1<sup>st</sup> line</b> Business case templates – Savings Proposals</p> <p><b>2<sup>nd</sup> line</b> <a href="#">Budget and Corporate Scrutiny Board</a> Star Chambers</p> <p><b>3<sup>rd</sup> line</b> External Audit CIPFA financial management review LGA Corporate Peer Review Grant Thornton Value for Money Governance Review - <a href="#">Follow Up- December 2022</a> LG Futures benchmarking data</p>																															
	2025/26	2026/27	2027/28 Onwards																																											
Delivery of the Medium-Term Financial Strategy (MTFS)																																														
16	<p><b>Budget Monitoring and Management 2024/25</b></p> <p>If the council does not put in place effective arrangements to monitor and manage the current year's budget then it will result in overspends and impact the resilience of the council's finances. Without timely and accurate monitoring the revenue and capital expenditure could exceed the agreed budget. This applies to the General Fund and the Housing Revenue Account (HRA).</p> <p>Risk Area – All Council Services</p>	*	*	*	*	<p>* The score will continue to remain fluid throughout each 12-month monitoring cycle, however, overall the council is confident that it has processes in place to be able to forecast the outturn position within a reasonable degree of certainty, and confident that it has the resources in place to be able to mitigate a forecast overspend position in the current year, up to a degree of tolerance of approximately 0.5% of the gross budget.</p> <table><tr><td></td><td colspan="12">2024/25</td></tr><tr><td>Monitoring Period</td><td>Apr</td><td>May</td><td>Jun</td><td>Jul</td><td>Aug</td><td>Sep</td><td>Oct</td><td>Nov</td><td>Dec</td><td>Jan</td><td>Feb</td><td>Mar</td></tr><tr><td>Revenue Budget Monitoring Position</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr></table> <p><b>Current and Ongoing Controls</b></p> <ul style="list-style-type: none"><li>A budget monitoring timetable is created annually and circulated to all in Finance, so that monthly monitoring deadlines are clearly understood and adhered to. Elements of the monitoring timetable relevant to budget holder involvement are circulated to budget holders.</li><li>Directors and ADs are asked to sign budget accountability letters at the start of the financial year, which set out the budgets available to each senior officer and provide assurance that the budgets are understood and will be adhered to as far as possible.</li><li>As part of the budget monitoring process, year to date expenditure figures are compared with profiled budgets, and variances to date are used to calculate forecast outturn information, in conjunction with information from budget managers, historic data, trend data and any other relevant information</li></ul>		2024/25												Monitoring Period	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Revenue Budget Monitoring Position													<p><b>1<sup>st</sup> line</b> Assigned budget holders</p> <p><b>2<sup>nd</sup> line</b> Leadership Team Budget and Corporate Scrutiny Board</p> <p><b>3<sup>rd</sup> line</b> External Audit Annual Internal Audit review- budgetary control</p>
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	<p>Risk owner- Alex Thompson, Executive Director of Finance and Transformation</p> <p>Cabinet Member: Councillor Paul Moore</p> <p><b>Objectives impacted: All</b></p>					<ul style="list-style-type: none"><li>Salaries monitoring is carried out at individual post level, using year to date cost information and information from budget managers on any changes in staffing that will take place in year.</li><li>All budget holders are sent their budget monitoring report monthly, and regular meetings are held between budget holders and Finance Business Partners. Budget holders are asked to provide forecast outturn information monthly.</li><li>Heads of Finance Business Partnering collate information for all directorates, challenging and checking assumptions with Finance Business Partners.</li><li>Directors take ownership of their directorate's monitoring position, signing off the position for their directorate each month as a true reflection of the position.</li><li>Finance Business Partners attend DMT meetings monthly to present each directorate's monitoring position, to ensure that the position is understood by all ADs and that mitigating actions are proposed to deal with overspends as necessary.</li><li>The monitoring position is presented monthly to Leadership Team, quarterly to Cabinet and quarterly to Budget Management and Corporate Scrutiny Board. Budget Management and Corporate Scrutiny Board has the opportunity to make recommendations to Cabinet in relation to the budget monitoring position reported.</li><li>Monitoring of current year savings (as per the MTFS) is carried out monthly by Finance Business Partners and presented to DMT meetings monthly and Leadership Team meetings monthly, so that the impact of any non-delivery or slippage of savings on the Council's outturn position is understood. Savings monitoring is also now included within quarterly budget monitoring reports to Cabinet.</li><li>A significant projected overspend at period 7 of 2023/24 led to immediate and proactive action by Leadership Team to introduce expenditure control measures in order to reduce the forecast overspend. Value for Money Panels and Vacancy Management Panels were introduced, reviewing and challenging all new expenditure requests over £1,000 and all new recruitment requests (respectively), and these measures are still in place in 2024/25. These measures help to mitigate any deterioration in the monitoring position and also ensure that the required in-year vacancy management savings (as per the MTFS) are delivered.</li></ul> <p><b>Further Actions</b></p> <ul style="list-style-type: none"><li>Introduction of budget monitoring within Oracle Fusion, which will provide each budget manager with 'real time' access to their area's budget and spend data.</li><li>Involving budget managers in the budget setting process will ensure that they understand their budget figures and how they have been developed.</li><li>Introduction of Oracle Fusion will lead to budget managers taking ownership of the budget monitoring process for their areas, actively reviewing data and ensuring that outturn projections are completed. Finance Business Partners will be able to ensure that monthly challenge meetings are taking place with ADs and that mitigating actions are proposed and put in place to address overspends.</li></ul>	
17	<p><b>Statement of Accounts</b></p> <p>Failure to produce a Statement of Accounts for 2024/25 within the required statutory deadline and/or insufficiency of external audit work carried out on the 2022/23 and 2023/24 Statements of Accounts could lead to reputational damage from potential qualification of the 2024/25 accounts.</p> <p>Risk Area – Finance and Resources</p> <p>Risk owner – Alex Thompson, Executive Director of Finance and Transformation</p> <p>Cabinet Member: Councillor Paul Moore</p> <p><b>Objectives impacted: All</b></p>	6 (green)		6 (green)	4 (green) April 2025	<p><b>Current and Ongoing Controls</b></p> <ul style="list-style-type: none"><li>A team of interim specialist contractors is currently in place to produce the outstanding Statements of Accounts and to address resulting audit queries.</li><li>A final Statement of Accounts for 2022/23 was presented to Audit and Risk Assurance Committee in December 2024, and a final Statement of Accounts for 2023/24 will be presented to Audit and Risk Assurance Committee in February 2025, in accordance with the government's backstop deadlines. The Council will then be up to date with production of its accounts.</li><li>The accounts for both 2022/23 and 2023/24 will only have been subject to a partial audit, however, and therefore there is a risk that this will impact on the length of time that it takes to rebuild assurance in relation to 2024/25 and future years. The Council is currently awaiting information from Grant Thornton in this regard. There may be an option for all remaining audit work on the 2023/24 accounts to be carried out during February and March 2025 which would help to mitigate the risk. The Council will pursue this option if available.</li><li>A closedown timetable for 2024/25 has been drafted by the Interim Head of Technical Accounting and officer training will be delivered as required in advance of the closure period.</li><li>A resource plan will be put in place by the Interim Head of Technical Accounting to deal with audit queries during the 2024/25 audit period, to ensure that officers are available to respond to queries and that there are no delays to the audit timetable.</li><li>A plan has been drafted to put in place additional permanent staff posts within the Finance structure, to increase capacity and move away from reliance on interim staff. A further plan will be developed for knowledge and skill transfer between the interim specialist contractors and the council's permanent Finance team to ensure that permanent staff are able to produce the accounts without contractor support.</li><li>In the short-term, an additional resource will be procured in order to assist with updating working papers to support the new chart of accounts as a result of the implementation of Oracle Fusion. The additional resource will review transactions in year to ensure that coding has taken place accurately. This will help to mitigate the risk of a delay to production to the 2024/25 accounts as a result of the introduction of the new Finance system.</li></ul>	<p><b>1<sup>st</sup> line</b></p> <p>Interim Head of Technical Accounting</p> <p><b>2<sup>nd</sup> line</b></p> <p>National guidance/regular updates across the sector</p> <p><b>3<sup>rd</sup> line</b></p> <p>External Audit</p> <p>Audit and Risk Assurance Committee</p>
18	<p><b>Housing Transformation.</b></p> <p>If the council does not put in place robust arrangements and receive appropriate assurances to ensure that the Housing function meets the requirements under the new Regulatory regime from both the Regulator of Social Housing and the Building Safety Regulator, with rigour and pace, then the council will fail in its responsibilities to provide good quality affordable housing.</p> <p>Risk Area – Housing</p> <p>Risk Owner – Alan Lunt, Executive Director - Place</p> <p>Cabinet Member: Councillor Vicki Smith</p> <p><b>Objectives impacted: 4</b></p>	9 (amber)		12 (red)	6 (green) December 2025	<p><b>Current and Ongoing Controls</b></p> <ul style="list-style-type: none"><li>Self-assessment completed against consumer standards with improvement actions embedded in the wider Housing Improvement and Transformation Plan</li><li>Governance Structure and reporting in place to monitor progress with the improvement plan, with regular reports to Leadership Team, Leader Meeting, Cabinet Member, Safer Neighbourhoods and Active Communities Scrutiny Board and Tenant and Leaseholder Scrutiny.</li><li>Third party audit to ensure compliance with documentation.</li><li>Housing Transformation Project in flight to delivery service efficiency, compliance and improvement, 10 overarching projects, with strong focus on returning to compliance with breaches of the consumer standards.</li><li>Monthly co-regulatory progress meetings with the Regulator for Social Housing</li><li>Risk level increased since last update because of the C3 regulatory judgement issued by the Regulator for Social Housing in October.</li></ul>	<p>External consultant acting as our critical friend to provide external validation on compliance with the consumer standards.</p> <p>Internal audit programme to be agreed.</p> <p>Co-regulatory progress meetings with the Regulator for Social Housing</p>

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19	<p><b>Homelessness and Temporary Accommodation.</b> Increasing demand from homeless presentation is resulting in more and longer placements in temporary accommodation, mitigation is required to prevent budget pressures from cost of the TA and subsidy loss through Housing Benefits and to avoid unlawful placements of households with children in B&amp;B accommodation for longer than 6 weeks.</p> <p>Risk Area – Housing Risk Owner – Alan Lunt, Executive Director - Place Cabinet Member: Councillor Vicki Smith <b>Objectives impacted: 4</b></p>	12 (red)	↑	16 (red)	12 (red) April 2025  9 (Amber) June 2025	<p><b>Current and Ongoing Controls</b></p> <ul style="list-style-type: none"><li>Homelessness and Rough Sleeper Strategy revised in 2022.</li><li>Service Operating model focuses on early intervention and prevention.</li><li>Range of interventions in place to prevent homelessness from the private rented sector,</li><li>Procurement of new contract for Temporary Accommodation delivered in 2023 in addition to increasing the size of own stock provision.</li><li>Canvassing for uplift on Local Housing Allowance to be increased annually in line with inflation.</li><li>Needs Assessment and Procurement of new Supported Housing Contracts completed in 2024.</li><li>Mobilisation of plans to convert a second former Extra Care Scheme from single person TA to family TA.</li><li>Risk Level increased since last report because of increasing demand on service, interventions to mitigate the risk will impact in Q1 of 25/26</li></ul> <p><b>Further Actions</b></p> <ul style="list-style-type: none"><li>Canvassing for changes to Homeless Prevention Grant formula which will see a 50% reduction in service provision in 25/26 if not amended.</li><li>Additional procurement in progress for interim accommodation to reflect longer TA placements.</li><li>Private Rented Sector – rent top ups to prevent homeless presentations where there is an affordability gap and risk of homelessness</li><li>Additional Homeless Prevention Grant from April 2025 to invest in Homeless Prevention capacity</li></ul>	Ministry of Housing, Communities and Local Government Advisory meetings held quarterly (3rd level).
20	<p><b>Continuous Improvement</b> The Council is no longer under government intervention and has concluded its Improvement Plan associated with that period of intervention. Failure to focus on continuous improvement across the organisation, as well as with our strategic partners and contractors like Serco, Sandwell Children's Trust and Sandwell Leisure Trust, and ensure that momentum is maintained as part of our journey towards becoming an excellent Council is a risk.</p> <p>Risk Area – All Council Services Risk Owner – James McLaughlin, Assistant Chief Executive Cabinet Member: Councillor Kerrie Carmichael, Leader of the Council <b>Objectives impacted: All</b></p>	9 (amber)	↔	9 (amber)	4 (green) June 2025	<p><b>Current and Ongoing Controls</b></p> <ul style="list-style-type: none"><li>A performance management framework was approved by the council in April 2022 to help monitor performance and track progress on the delivery of the strategic outcomes in the Corporate Plan.</li><li>Review of Governance and Decision Making built into Corporate Transformation Programme.</li><li>The appointment of a permanent Strategic Leadership Team has been concluded, pending recruitment to Executive Director of People</li><li>Performance Board meets quarterly to review KPIs in the new Council Plan and People Strategy, external contractual arrangements and Member Casework.</li><li>Activity from the former Improvement Plan embedded within the Council's Council Plan and AD Business Plans</li><li>Grant Thornton VfM Governance Review follow up review in December 2023 highlighted the continued progress of the council on its improvement journey and lifted the three statutory recommendations from their 2021 review.</li><li>Arrangements for scrutiny consideration of the council's key contracts is in progress.</li><li>Establishment of consistent contract management for both significant capital and service contracts across the Council. The contract management resources online (Council intranet site) provide templates for a consistent approach to contract management. In addition, the introduction of the contract management module on Oracle Fusion will contribute towards effective contract and performance management (it can capture information around KPIs and risks etc)</li></ul> <p><b>Further Actions</b></p> <ul style="list-style-type: none"><li>Ongoing implementation and monitoring of the progress made against the plans.</li><li>Demonstrating evidence of sustainable and continuous improvement</li><li>Review to address key and improvement recommendations from Grant Thornton's 2023 follow up review.</li><li>LGA Corporate Peer Challenge planned for late 2025/early 2026</li><li>Awaiting report of the LGA Peer Review of HR which will inform an Improvement Plan for HR to be developed by Spring 2025</li><li>Review of the current arrangements in place for each key contractor to ensure they remain fit for purpose and that the partnership objectives are aligned to the refreshed corporate plan.</li></ul>	<p><b>1<sup>st</sup> line</b> Council Plan</p> <p><b>2<sup>nd</sup> Line</b> Reports to Performance Board, Cabinet and Budget &amp; Corporate Scrutiny Management Board on quarterly basis Audit and Risk Committee</p> <p><b>3<sup>rd</sup> line</b> Grant Thornton Value for Money Governance Review - Follow Up- December 2023</p>
21	<p><b>SEND – Placements and Transport</b></p> <p>If the council does not consider options on how to manage:</p> <p>A) the increasing upwards trajectory of demand in respect of SEND Travel Assistance</p> <p>B) both demand and cost of SEND placements</p> <p>there will significant impact on the Council's budget and the High Needs Block</p> <p>Risk Area – Children's Services Risk Owner – Sally Giles, Director of Children and Education Cabinet Member: Councillor Jalal Uddin <b>Objectives impacted: 1</b></p>	16 (red)  16 (red)	↓  ↔	9 (amber)  16 (red)	6 (amber) August 2025  9 (amber) Oct 2025	<p>This risk relates to the national rise in children and young people with SEND and who require Education, Health and Care Plans (EHCPs) which in turn results in increasing demand for additional support services including specialist placements. The increased demand arises from a combination of factors including population growth, better and earlier diagnosis of conditions such as autism and extension of the service for children with SEND up to the age of 25 (the latter took effect in the context of the 2014 reforms, which were not funded). Covid lockdowns / inconsistent educational support have also had an impact and have contributed to a rise in Social Emotional and Mental Health referrals for multi-agency assessment / EHC plans from Early Years to Post 16.</p> <p>There has been a significant increase in requests for specialist placements (Special schools / mainstream schools with Specialist Resource bases/ SEN Units). The increase in the number of children and young people with EHC plans has also driven up transport costs.</p> <p><b>Current and Ongoing Controls</b></p> <ul style="list-style-type: none"><li>The introduction of a Flexible Purchasing System (FPS) has helped to reduce the cost of home to school transport without impacting on the quality of service or safeguarding of children and young people with SEND and their families<ul style="list-style-type: none"><li>More competitive market with an increase in number and type of operators i.e. SME and National Companies</li><li>Single school contracts creating greater opportunities</li><li>Revised costing models that</li><li>Improved data supporting forecasting and robust contract management.</li></ul></li><li>Development of a needs assessment to support the delivery of a specialist place planning strategy to address capacity issues and ensure that children and young people can attend local school, rather than independent specialist provision out of borough.</li><li>Newton Europe have now completed a diagnostic, looking at the end to end SEND Travel Assistance process and how it can be improved, and costs reduced.</li></ul> <p><b>Further Actions</b></p> <ul style="list-style-type: none"><li>Increase the number of specialist places in Sandwell schools to enable children to attend their local school</li><li>Continue to develop the FPS to provide greater control for the council and reduce the risk of increasing costs</li><li>Continue to work with market to deliver a VFM high quality service.</li><li>Build on the diagnostic work undertaken by Newton Europe to review the end to end SEND Travel Assistance process and how it can be improved, and reduce the reliance on home to school transport</li><li>Review the Council's post 16 offer</li></ul>	<p><b>1<sup>st</sup> line</b> Key Performance Indicators Budget Monitoring</p> <p><b>2<sup>nd</sup> line</b> Regular updates to leadership team Corporate Transformation Board</p> <p><b>3<sup>rd</sup> line</b> Ofsted monitoring visits Areas SEND Inspection July 2023</p>

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						<ul style="list-style-type: none"><li>An improvement plan is being developed to ensure that systems, processes, and structures in Inclusive Learning Services are robust, streamlined and effective.</li></ul>	