Strategic Risk Register @ May 2025

Risk Ref	Risk Title and Description	Previous score (Jan 2025)	Movement in risk score	Current risk score (May 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	**Children's Social Care**
	
	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:
	
	• Safeguard vulnerable children
	• Promote and improve the outcomes of children in its care
	• Manage any adverse financial consequences arising from the failure to create favourable outcomes for children within the resources available to it
	• 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.
	
	If the Council is unable to procure children's social care services from SCT in exchange for an affordable and sustainable contract sum, there is a risk of de-stabilising the Council's MTFS
	
	Risk Area – Children's Services
	
	Risk Owner – Sally Giles, Director of Children and Education
	
	Cabinet Member: Councillor Jalal Uddin
	
	Objectives impacted: 1
		8 (amber)	↔	8 (amber)	4 (green) Good
					
					Outcome of ILACS inspection projected to take place Dec 2025
						Current and Ongoing Controls
						• Performance and contract management against KPIs and the improvement plan. KPI's are reviewed monthly via the contractual Operational Partnership Board and quarterly at the Strategic Partnership Board, they are also reported to Cabinet via the quartering performance reporting framework
						• The Ofsted inspection of adoption services commissioned through the RAA and delivered by the Trust rated all areas as 'Good'.
						• The most recent Ofsted inspection of the Fostering service rated all areas as 'Good'.
						• Completion of case file audits and learning from the audit is used to ensure practice improvement.
						• Ongoing measures to improve staffing levels and recruitment via the development of a workforce strategy and market supplements.
						• The Inspection of Local Authority Children's Services (ILACS) took place in May 2022 and reported a judgement of 'Requires Improvement to be Good' and continues to inform the risk score.
						• OFSTED undertook an inspection of the Fostering Service in October 2024. It was again judged as 'Good', however recognised that SCT needed to put a permanent registered manager in post.
						• Two focused visits by OFSTED have taken place, with both being generally positive. The findings of the visits has informed the Trusts 'Areas of Focus Action Plan' to address any concerns raised.
						• Benchmarking of children's social care costs against statistical neighbours has demonstrated that the Council's expenditure in this area is reasonable and lower than average. Benchmarking will continue to take place
						
						Further Actions
						• 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 Independent Review of Children's Social Care Implementation of a shared practice model across services.
						• The LGA undertook a peer review in January 2025 and advised that:
						    o 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.
						    o 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.
						    o 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.
						    o 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.
						    o The Trust needs to address delays in achieving permanence for some children with a plan for a special guardianship order.
						    o Further work with adult social care and other adult services should be expedited to drive forward improvements on transitional safeguarding issues.
						• An Independent third party has undertaken work to assess opportunities for the Trust to make savings, some of which the Trust has already identified, the Council will monitor the implementation of these. The third party is undertaking further work to quantify potential savings in respect of residential care unit cost, identifying activity that could be undertaken to achieve this. The Council will continue to monitor this and support the Trust as required.
						• Development of a three-year contract sum to be paid to SCT, to provide certainty of costs for the Council and certainty of income for SCT. This will enable the Council to put in place plans to reduce costs of other service areas, in order to be able to fund children's social care, as required
							1st line
							Key Performance Indicators (including social worker vacancy rates and placements)
							Operational Partnership and Strategic Partnership Boards
							
							2nd line
							Sandwell Local Safeguarding Children's Board Annual Report
							Reports to Scrutiny
							Rolling programme of audits of case files as part of the quality assurance framework
							Performance Management framework and Service Delivery Contract
							SCT business plan
							Corporate Parenting Board
							
							3rd line
							Ofsted monitoring and focussed visits
							DfE improvement Board (independently chaired by a DfE consultant
							Grant Thornton – Value for Money Governance Review 2021
							ILACS Ofsted inspection July 2022
							Independent Reviewing Officer function
							SCT external audit report
							LG Futures benchmarking exercise
							Informal meeting between senior officers from both the Council and Trust

2	**Business Continuity Management** 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. Risk Area – All Council services Risk owner – Alan Lunt, Executive Director – Place Cabinet Member: Cllr Kerrie Carmichael? **Objectives impacted: All**	8 (amber)	↔	8 (amber)	8 (amber) Achieved	**Current and Ongoing Controls** • 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. • An SBS outage in May 2024 was well managed by the Council demonstrating learning from the event in May 2022. • Service workshops with a focus on ICT to improve business continuity planning, led by the Resilience Team and supported by ICT, held with 5 services and one with a Directorate senior management team in 2024-25. Workshops will continue to be offered to services in 2025-26. **Further Actions** • National Power Outage Exercise to be held in July to work through Council's response to the failure of the national electricity transmission system. • Services have been directed to ensure plans are reviewed to include contingencies in the event of disruption to the Oracle Fusion and MySandwell platforms with progress to be reported to SLT in October 2025. • Services to arrange business continuity workshops and take up offer from Resilience Team to support. • ICT Disaster Recovery workshops ongoing and 'surprise test' run has taken place, identifying that further works required but the DR plan is forming well. This risk is linked to, and supports, the Emergency Planning risk held at Directorate level that ensures effective arrangements are in place to plan and mitigate against national, regional, or local emergencies as defined by Part 1 of the Civil Contingencies Act 2004. Current controls include: • Participation in the West Midlands Local Resilience Forum (LRF) • Contribution to the Community Risk Register that informs the capabilities and plans required of partners. • Emergency Plans in place for identified risks that are continually reviewed with a training, testing and exercise programme approved by the Leadership Team.	**1st line** Review program of emergency plans Service business continuity plan register and monitoring Post incident reports Test exercises including cyber exercise **2nd line** Resilience Team reports to Leadership Team **3rd Line** Audit and Risk Assurance Committee

Risk Ref	Risk Title and Description	Previous score (Jan 2025)	Movement in risk score	Current risk score (May 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)
3	**Compliance with the Data Protection Act 2018 (DPA 2018), the General Data Protection Regulations (GDPR) and Freedom of Information Act 2000 (FOIA)** 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. 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. Risk Area – Finance and Transformation Risk Owner- Mike Jones, Assistant Director – Legal and Assurance Cabinet Member: Councillor Paul Moore **Objectives impacted: 3**	8 amber	↔	8 amber	8 (amber) March 2025 Achieved	**Current and Ongoing Controls** • 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. • 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. Cyclical review commenced of existing policy and procedure suite. Phased programme will see reports to Information Governance Board (IGB). • Information Asset Registers capture the information held by the Council service areas and are reviewed annually. • Information champions disseminate, feedback, facilitate and co-ordinate IG activity. • Monthly review of ICO updates, guidance and sector practice. • 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'. • Annual mandatory data protection and cyber security training is entrained for all staff. • Compliance with the Council's data retention policy, which is reviewed regularly. • Improved performance and monitoring arrangements for compliance with FOI and SAR responses. • 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. • Review of existing internal and public facing policy suite and IG framework. • 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. • Implemented the email retention policy, and automatic retention is now in place. • New policy and guidance in draft to enable use of WhatsApp and Artificial Intelligence (AI) – introduces key principles, control framework and authorisation gateway to allow restricted use and development of solution. **Further Actions** • 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. • 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. • Council Monitoring Officer is undertaking a review of all practices, procedures and policies to ensure best practice is embedded to underpin assurance of compliance frameworks for IG. • 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. • Further improvement required in corporate compliance with disclosure requests and SARs. Refresh of existing training and guidance materials in progress, updates cascaded through IGB. • 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. • 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. 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.	**1st line** Information Champions Data Protection Officer Information asset registers Information incident log **2nd line** Information Governance Board Performance data on compliance with FOI and SAR responses to Leadership Team and directors FOIA disclosure log **3rd line** Information Commissioner's Office Internal Audit reviews First Tier Tribunal decisions
4	**Cyber Security** 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: • 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 • The loss of corporate and sensitive personal data (including bank details) • Enforcement action • Significant financial loss • Employee stress; and • Reputational damage	12 (red)	↓	9 amber	green	**Current and Ongoing Controls** • **Technical Security Controls**: The Council maintains a suite of technical controls to protect its network perimeter and information assets, including firewalls, endpoint protection, and secure configurations. • **Vulnerability Management**: Regular vulnerability scanning is conducted to identify and remediate weaknesses across the ICT estate, supported by curated threat intelligence feeds to stay ahead of emerging risks. • **Annual Health Checks and Penetration Testing**: Independent ICT Health Checks and penetration tests are carried out annually to validate the effectiveness of security controls and identify areas for improvement. • **Incident Response Playbooks**: Cyber incident playbooks are maintained and regularly reviewed to ensure readiness for a range of threat scenarios, enabling swift and coordinated responses. • **Cyber Awareness and Training**: All staff are required to complete annual cyber security training. This is reinforced through regular internal communications that raise awareness of phishing, social engineering, and other threats. • **Information Governance Collaboration**: The ICT Service works closely with the Council's Information Governance Team to ensure a holistic approach to information protection and compliance with data protection standards. • **Technology Lifecycle Management**: An ongoing programme is in place to retire and replace obsolete or unsupported technology platforms, reducing exposure to known vulnerabilities. • **Security Tooling via Microsoft E5**: The uplift to Microsoft E5 licensing has enabled the deployment of advanced security and compliance tools, including Defender for Endpoint and Microsoft Purview. • **Budget Reprofiling and Oversight**: Cyber budgets have been reprofiled to address identified pressures, ensuring that funding is directed toward priority areas of risk mitigation and resilience. **Further actions** • **Expansion of 24/7 SOC Services**: ICT will extend its partnership with Phoenix Software to evolve the current Security Operations Centre (SOC) into a virtual cyber team. This team will provide continuous 24/7 monitoring, threat detection, and incident response capabilities, enhancing real-time defence against cyber threats. • **Cyber Security Leadership and Governance**: A Cyber Security Lead will be recruited to manage the SOC service and provide strategic oversight of cyber security, patching, and resilience activities. This role will also support compliance with PSN, CAF, and PCI-DSS standards.	**1st line** Strategic partnership with Phoenix Software for SOC and GRC services. Microsoft Sentinel and Defender for Endpoint deployments. Cyber Essentials Plus and CIS gap analysis underway. Rubrik implementation for cyber recovery assurance. Mandatory MFA enforcement programme. **2nd line** Cyber governance board oversight and alignment with national frameworks (CAF, PSN, PCI-DSS). **3rd line** Enterprise Security Assessment by Microsoft. LGA Cyber Assessment NHS Digital PSN certification Audit and Risk Assurance Committee risk review

Risk Ref	Risk Title and Description	Previous score (Jan 2025)	Movement in risk score	Current risk score (May 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)
	Additionally, the Council will be: • Unable to meet sector defined standards and compliance for cyber resilience e.g. PSN, CAF, PCI-DSS • Unable to share and collaborate with partner organisations in a joined-up manner as the Council will not be viewed as a trusted partner Risk Area – Finance and Transformation Risk Owner – Alex Thompson, Executive Director of Finance and Transformation Cabinet Member: Councillor Kerrie Carmichael, Leader of the Council **Objectives impacted: All**					• **Rubrik-Based Data Security Implementation**: A new backup and data security solution will be implemented using Rubrik. This hybrid solution will secure on-premise, cloud, and M365 data, with a focus on rapid recovery, ransomware resilience, and clear RTO/RPO metrics. • **Cyber Governance and Assurance**: The ICT team will engage Phoenix and Rubrik to assist in the delivery of Governance, Risk and Compliance (GRC) services, including Cyber Essentials Plus, CAF and CIS gap analyses, and the development of Cyber Incident Response Plans. These efforts will align with the Council's broader digital assurance framework. • **Mandatory Multifactor Authentication (MFA) Rollout**: A mandatory Multi-Factor Authentication (MFA) campaign will be completed, with full enforcement by 31 July 2025. This will significantly reduce the risk of credential-based attacks. • **Enterprise Security Assessment**: A comprehensive security assessment will be conducted with Microsoft to identify vulnerabilities and prioritise remediation actions. • **Strategic Risk Alignment**: Cyber risk reporting will be aligned across Sandwell MBC and Sandwell Children's Trust, ensuring consistency in risk registers and assurance statements for audit committees. We will also create a dedicated Cyber Resilience Governance Board providing oversight of cyber-related initiatives and ensuring alignment with corporate risk and assurance frameworks. **Further Actions (In Progress):** • Appoint an interim Cyber Security Lead by end of August 2025. • Complete Rubrik implementation and backup review by September 2025. • Complete PSN resubmission and PCI-DSS improvement programme by February 2026. • Continue participation in the Get CAF Ready programme into 2026. • Explore LGA Cyber 360 review and Business Continuity Reaction Exercise.	
5	**Regeneration Fund Programmes** 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. Risk area- Place Risk owner – Alan Lunt, Executive Director – Place Cabinet Member: Councillor Peter Hughes **Objectives impacted – 2, 3, 4, 5 and 6**	6 (green)	⬌	6 (green)	4 (green) Programme completion of all projects and delivery of intended outcomes	This risk sets out the next phase of the Regeneration Fund Programmes. Towns Fund (approval received by the Council for all 16 business cases that were submitted as part of the approved TIPs). **Current and Ongoing Controls** • 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. • 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. • Fortnightly engagement with advisors from MHCLG • 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. **Further Actions** • Ongoing implementation of delivery phase of projects and programme plan. • Ongoing reviews of financial profiles to manage supply chain issues and implications of cost inflation. Levelling Up Partnership **Current and Ongoing Controls** • Robust governance in place to oversee the LUP programme via the Wednesbury LUP Board. Governance arrangements agreed by Cabinet in September 2023. • 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. • Monthly engagement with advisors from MHCLG with regional representatives attending the LUP Board. • 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. • Reporting to Leadership Team Quarterly. • All LUP projects have undergone a capital appraisal as part of the Council's assurance processes and have been approved subject to recommendations. • 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. Finance have confirmed sufficient capacity within the Council's capital programme (via swaps) to accommodate spend post March 2025. **Further Actions** • Implement delivery phase of projects and programme plan. • Ongoing reviews of financial profiles to manage supply chain issues and implications of cost inflation. • Agree remediation and permitting strategy for Friar Park development with Environment Agency • Commence planning process in relation to Friar Park remediation	**1st line** Town Deal Boards **2nd line** Scrutiny Reviews Monitoring and reporting of outcome indicators, with processes in place to manage changes and risks during delivery stage. **3rd line** Ministry of Housing, Communities and Local Government (MHCLG)

Risk Ref	Risk Title and Description	Previous score (Jan 2025)	Movement in risk score	Current risk score (May 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)

6	**Customer Experience**
	
	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.
	
	Risk area – All Council Services
	
	Risk owner – James McLaughlin, Assistant Chief Executive
	
	Cabinet Member: Councillor Paul Moore
	
	Objectives impacted - All
		8 (amber)	⬇	6 (green)	6 (green) June 2025 Achieved	**Current and Ongoing Controls**
						• New operating model for Council employees is well embedded across all service areas
						• Delivery of bespoke Customer Service Training to approx. 600 staff across the Council
						• Key priority within the Corporate Transformation Programme – new focus being provided in summer of 2025
						• Regular discussions and focus sessions have taken place at Strategic Leadership Team to address concerns and issues. Also, a priority for Performance Board.
						• A new telephony system will be implemented in the summer of 2025 – this has been delayed from spring of 2025
						• The MySandwell offer is continuously being developed.
						• Collection of Customer Satisfaction data is continuously being looked at and new methods trialled.
						• Adoption of Customer Experience Strategy (approved by Cabinet in May 2025)
						• Adoption of Customer Services Standards for Staff (launched in April 2025)
						• The four main Workstreams are:
						  - Review of Contact Centres, as required by Medium Term Financial Strategy commitments
						  - Review of the One Stop Shop and exploration of a Community Hubs offer for face to face services in each Town.
						  - Technology – review of all Customer related technology & identification of any gaps: procure delivery partner to replace the Council's telephony system (achieved).
						• 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.
						• Further delivery of bespoke Customer Services Training for front facing roles across the Council during autumn and winter 2025/26
						• Leadership and Management Conference set out clarity on quality and consistency of customer services
						• New Customer Service Standards developed and to be rolled out to all staff linked to Values and Behaviours
						
						Further Actions
						• Continued stakeholder engagement, in particular within the One Stop Shop (Ongoing).
						• Additional capacity and resources to be identified to meet current demand for face-to-face services.
						• Review of approach to Digital Working within the Council leading to a Digital Strategy (covering digital inclusion also)
						• Directorate Leadership Teams to regularly review customer experience.
							1st line
							Incorporate recent recommendations from Budget and Corporate Scrutiny into the Customer Journey Action Plan
							
							2nd line
							Customer satisfaction survey
							Customer compliments and complaints system
							Budget and Corporate Scrutiny Board Review
							Monitoring, reporting & 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
							
							3rd line
							Local Government Ombudsman report

7	**Equalities** 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. Risk area – All Council Services Risk owner – James McLaughlin, Assistant Chief Executive Cabinet Member: Councillor Kerrie Carmichael, Leader of the Council **Objectives impacted - 5**	8 (amber)	⬅➡	8 (amber)	6 (green)	**Current and Ongoing Controls** • An Equality Diversity and Inclusion Commission has been set up with agreed Terms of Reference ad is chaired by the Leader of the Council. • 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. • A review of the Equality policy has been completed and was launched in December 2022, following Cabinet approval. • 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. • 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. • A robust governance framework to help monitor and review the objectives and actions in the plan is also in place. • An Equalities Calendar has been developed and implemented that details many EDI events to raise awareness of the agenda. • Various events such as One Council Fast Challenge & Grand Iftar for Ramadan in March and Vaisakhi celebration in April have been successfully delivered leading to improved awareness and understanding. • The LGA Equality Framework has been approved for use by Cabinet will be used to develop the Council's first EDI Single Framework Strategy. • Refresh of the Council's Equality Objective was published in March 2023 • 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. • We have prepared a Public Sector Equality Duty (PSED) service user report. • EDI E-Learning Module launched in August 2024. **Further actions** • EDI Strategy to be approved by Cabinet in July 2025, based on the LGA Equality Framework • Governance for EDI to be reviewed, including the role of the Staff Networks and the EDI Commission • Ensure that EDI is embedded within the "Engine Room" of the Council by resources being located within HR and Service Improvement • Review effectiveness of current governance for EDI across the organisation in summer of 2025 • Engage with WMCA Equality Taskforce and specific work commissioned through the WM Mayor	**1st line** Employee Engagement Survey 2022 **2nd line** Sandwell Equalities Commission **3rd line** LGA Peer Review
8	**Climate Change** 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: • reputational damage • financial impact • increased demand for Council resources (in the event of extreme weather) and • a loss in public confidence.	12 (red)	⬇	9 (amber)	8 (amber) 2025 - Update Action Plan Monitoring Tool and provide GAP analysis 2025 – Review and update Climate Change Strategy and Action Plan along with updating	**Current and Ongoing Controls** • Climate Change strategy 2020-2041 in place which sets out the 2030 target for the Council. • Member steering group to oversee implementation of the climate change action plan. • Climate change champions in place (officer level) and a Cabinet Member and member advisor champions in place. • An action plan for implementing the strategy was approved by Cabinet in March 2022. • 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. • Action plan monitoring tool has now been established following an internal audit report. This document is owned by the Climate Change Team and is reviewed 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. **Further Actions**	**1st line** Climate Change Strategy 2020-2042 Climate Change Improvement Plan **2nd line** Climate Change Programme Board Member Steering Group **3rd line** 2023 Internal Audit Report – Limited Assurance

Risk Ref	Risk Title and Description	Previous score (Jan 2025)	Movement in risk score	Current risk score (May 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)
	In addition, managing the effects of climate change will also have significant financial impact which the Council will need to address. Risk Area – All Services Risk Owner – Alan Lunt, Executive Director – Place Cabinet Member: Councillor Keith Allcock **Objectives impacted: All**				board membership / Terms of Reference 2030 – Target date for Council to become Net Zero	• Gap analysis was to previously be conducted to assess the Councils' ability to implement the action plan, followed by a report on available options in 2024/25.. This has since been superseded and this will now be addressed as part of the refreshed Climate Change Board and update of the Climate Change Strategy and Action Plan due to be undertaken in 2025/26. • 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. • 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. • 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. • To implement the Asset Management Strategy approved by Cabinet in November 2022 which seeks to significantly rationalise the Councils buildings and assets. • 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. • 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. • 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. • Refresh of the Climate Change Board and Terms of Reference has now been undertaken having been presented to Leadership Team in 2024. • Climate Change Strategy and Action Plan to be updated by expiry of current version during 2025/26 • 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. • Transition of household waste collections to Alternate Weekly Collections (AWC) and dual-stream `recycling to improve the borough's recycling rate and reduce the amount of waste sent for incineration. • Through the Corporate Fleet Review a Vehicle Replacement Panel will assess opportunities to replace internal combustion vehicles with zero-emission vehicles (ZEV) as part of the business case for every new vehicle purchase.	
9	**Workforce Recruitment** 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. Risk area – All Council services Risk owner – James McLaughlin, Assistant Chief Executive Cabinet Member: Councillor Paul Moore **Objectives impacted: All**	9 (amber)	⬇	6 (green)	6 (green) March 2025 Achieved	The risk concerns issues were 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 was put back in order to allow the recruitment strategy to be agreed and fully embedded, and until results over the mid-term were known. **Current and Ongoing Controls:** • Adoption of People Strategy, values and communication of ambition for the workforce, aligned to the Council Plan and Values and Behaviours, accompanied by annual delivery plans for each year. • Recruitment microsite (We Are Sandwell) has been launched on WM Jobs and is consistent with corporate branding approach to maximise impact on candidate attraction. • 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. • Recruitment and selection refresher training for hiring managers in order to share best practice in recruiting qualified and skilled employees. • Pre-employment checks are carried out in line with requirements for the job role including any statutory requirements. • Regular 121 meetings (supervision) and annual appraisal process is in place to ensure employees are engaged and can raise any concerns. Council testing its own compliance with Annual Reviews and 121s in place during May and June for SLT review. • Regular employment engagement (full) and pulse surveys are undertaken, and plans are developed and implemented to address any areas requiring further action. • Resourcing Team active engagement in regional and wider attraction campaigns. • NGDP Graduates undertaking project to review how the Council can become an 'employer of choice' for young people and make recommendations for change. • 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. • Review and extend advertising, to include focus on attraction of diverse applicants – again this will form part of the recruitment strategy. • 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. Further Actions: • Develop and provide management reports and Directorate level down reports to identify clearer picture of recruitment and turnover data at a more detailed level • Develop an Apprenticeship campaign for the Council to identify 100 new entrant apprenticeships by 2027. Identify all establishment/roles that could be converted into apprenticeship either now or in the future. Fund additional apprenticeships roles. • Continue to develop our recruitment microsite and link with wider LGA recruitment campaign to attract people into local government • 2nd Year action plans for People Strategy and restructure of HR&OD service to focus on talent acquisition and workforce planning • Planning for 2025 Employee Survey to show employee engagement and commitment to ensure skills and experience is retained. •	**1st line** Pulse surveys HR related KPIs and data Appraisal process **2nd line** Employee Engagement Survey Benchmarking analysis **3rd line** LGA Workforce Survey 2022
10	**Borough Archives** 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	9 (amber)	⬌	8 (amber)	8 (amber)	**Current and Ongoing Controls** • 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. • A feasibility study has been completed and a replacement archive solution for Sandwell's archives has been identified and was approved by Cabinet in November 2022. • A New Qualified Archivist is now appointed and in place. The Business Manager – Museums and Archives is also a qualified archivist. • 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. • 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. **Further Actions** • Funding sources for cost of capital to build the archives needs to be identified and agreed. • 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. • 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.	**1st line** Feasibility Study **2nd line** Cabinet approval of replacement archive solution **3rd line** The National Archives Archive Service accreditation

	meets the required British Standard. Risk area – All Council services Risk owner – Alan Lunt, Executive Director - Place Cabinet Member: Councillor Suzanne Hartwell **Objectives impacted: All**					• A design feasibility was completed to support the relocation of the Archives into Smethwick Council House prior to the construction of a new Archives Centre. However, this has been determined to not represent value for money and as such will not be progressed. A working group has now been established to progress the specification and design of the new archives centre to assist with securing additional funding.	
11	**Electoral arrangements** 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 **Objectives impacted: All**	8 (amber)	↔	8 (amber)	4 (green) Sept 2025	**Current and Ongoing Controls** • 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. • A One Council approach is being taken in order that the wider Council can provide necessary support. • 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. • There is a review of polling stations to see which ones are suitable and unsuitable. • Robust and updated training programme will be in place for all polling inspectors and presiding officers. • Job roles for election staff are being updated to provide clarification on what is required and to assist in arriving at the correct fee. • The Electoral Services Manager is part of the Business Change Network facilitated by the Cabinet Office and consequently is very well informed. • 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". • Awareness Campaign and media campaigns to promote current and any subsequent emergent Voter ID requirements to compliment national campaigns by the Electoral Commission. • Regular briefings with members undertaken during recent local, regional and national elections. • Regular networking meetings taking place relevant internal stakeholders including Executive Director, Service Director, Assistant Director and Manager as required. • Capacity and resourcing options are being explored and subject to continuous review. **Further Actions** 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. Comprehensive engagement undertaken with LGBCE as part of ward boundary review process: detailed submissions on Council size and warding pattern submitted. Representations on Council size adopted, representations on proposals for 22 of 24 wards aligned with Council submission: further representation to be made over remaining 2 proposed wards by 9 May. Formal parliamentary approval of new ward pattern due September 2025: preparatory work underway for polling district review to align with this timescale. Engagement with national electoral commission and national networks to gather feedback from current cycle of mayoral and local elections being held May 2025 in other areas of England to identify any emergent issues or best practice opportunities to aid preparations for May 2026 all out elections.	**1st line** Elections Returning Officer Deputy Returning Officers Monitoring Officer Elections Service Manager **2nd line** Polling station inspectors **3rd line** Electoral Commission
12	**Sandwell Local Plan** 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 **Objectives impacted: All**	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. **Current and Ongoing Controls** • Members regularly briefed on key and up to date issues. Informing of facts and evidence based. • Project Manager recruited to lead on the delivery of the Sandwell Plan (fixed term post to Dec 2026). • Additional revenue budget secured to deliver the Sandwell Plan (Cabinet Report Dec 2022). • Activities monitored against agreed programme and reported to Leadership Team quarterly - consultation on draft Sandwell Local Plan completed in line with programme. Consultation on Publication Plan (final version) completed. Examination in Public scheduled for July and September 2025. **Further Actions** • Quarterly update reports to Leadership Team • Ensure the Plan conforms with emerging Government planning regulations where relevant.	**1st line** Appointment of dedicated project manager **2nd line** Regular updates to Leadership Team, Cabinet Member for Regeneration and Cabinet as appropriate. **3rd Line** Ongoing review of conformity with emerging Government planning reforms.
13	**Organisational culture** If the Council does not have an effective organisational culture, then this could result in: • Poor officer and member relationships	8 (amber)	↓	6 (green)	4 (green) March 2025 Achieved	**Current and Ongoing Controls** • Regular meetings in place between senior members and officers to develop positive working relationships and information sharing. • LGA training on officer/member relationships delivered in September 2022, 2024 and April 2025. • Launch of One Team Framework (values and behaviours) including Staff Conference and Managers workshops • Employee Engagement Survey 2022 results disseminated and discussed at Directorate Management Teams and team meetings - action plans developed and monitored at Leadership Team.	**1st line** One Team Framework **2nd line** Employee Engagement Survey

Risk Ref	Risk Title and Description	Previous score (Jan 2025)	Movement in risk score	Current risk score (May 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)
	• Negative impact on employee engagement • Inability to demonstrate effective people management, • Weak diversity and inclusion practices • Recruitment and retention issues • Negative impact on the delivery of the improvement plan and • Potential for extended government intervention • Failure to deliver the corporate plan • Reputational damage • Missed opportunities for continuous improvement Risk area – All Council services Risk owner – James McLaughlin, Assistant Chief Executive Cabinet Member: Councillor Kerrie Carmichael, Leader of the Council **Objectives impacted: All**					• Employee Engagement Survey 2023 results disseminated and discussed at Directorate Management Teams – actions to address themes incorporated into People Strategy and service business plans. • Cabinet and Strategic Leadership Team Away Days arranged quarterly. • New Council Plan and People Strategy launched in July 2024 • New Neighbourhoods Model was implemented in April 2025 which will improve Members' access to officers on the ground to get things done. **Further Actions** • Embedding One Team Framework • Delivery Plan for Year 2 of People Strategy • Mechanisms to be identified for ongoing insight and assurance around health of Officer and Member Relationship • Management and Leadership Conference to be arranged in September 2025 for 400+ managers across the Council. • We Are Sandwell Awards • Targeted Management and Leadership Development programmes for women, minority communities and disability to be established • Preparation for Corporate Peer Challenge in January 2025 • Establishment of new Service Director tier of leadership in July 2025 for ACE, Finance & Transformation and Place, with proposals for revised senior leadership structures for Adult Care & Public Health and Children & Education to be considered by Members later in 2025	**3rd line** External Reviews (Grant Thornton and LGA) providing assurance that organisational culture change has started to occur.
14	**Strategic Workforce Development for Adult Social Care Recruitment, Retention and Sickness Absence** 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. Risk Area – Adult Social Care Risk Owner – Rashpal Bishop, Director of Adult Social Care Cabinet Member: Councillor Jackie Taylor **Objectives impacted: 2**	12 (red)	[down arrow]	9 (amber)	8 (amber) June 2025 Achieved	**Current and Ongoing Controls** • ASC Workforce Strategy approved by the ASC Transformation Board in January 2024. • The Core Workforce Delivery Group has been established. • Workforce Workshop held in January 2024. • Recruitment Events held. • 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. • A student programme and the Assessed and Supported Year in Employment programme for Social Workers is in place. This is currently being reviewed by Skills for Care. • Apprenticeships within the Directorate utilising the Apprenticeship Levy to access accredited qualifications. • An apprenticeship programme for social work is in place with Warwickshire University, a similar programme for Occupational Therapy is being developed with Wolverhampton University. • Qualification Sponsorship scheme to support employees to obtain recognised qualifications to enhance their work performance and skills. • Pay benchmarking for staff has been completed, job descriptions have been updated and where appropriate jobs have been regarded. • Regular 121 meetings (supervision) and annual appraisal process is in place to ensure employees are engaged and can raise any concerns. • 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. • Plans are developed and implemented to address any areas requiring further action from the employee engagement survey. • ASC branding for our unique selling point in place. • Recruitment campaign held and materials available for all to use on the intranet. • Subgroups for recruitment, retention and learning and development are set up to define key actions to share with the Adult Social Care Transformation Board. • Sickness Absence Monitoring and reporting on stage 3 cases. • Monthly HR & Management Sickness Absence Review Meetings. • Employee Relations Meetings. • Managers in regular welfare contact with employees and refer to occupational health where muscular/skeletal and stress, depression and mental health related absence. • Implement adjustments to support staff back into work and undertake stress risk assessments. • Managers / Staff encouraged to access the My Wellbeing Hub. • The Wellbeing Specialist provided an update on Occupational Health and wellbeing support available to staff at the Operational Heads Meeting ih May 2024 with an offer of coming out to team meetings if required. • 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. • All sickness absence management is discussed at the performance Meetings between the Assistant Director of Social Work and the Operational Heads in her area. • Wellbeing Event took place in January 2025 for all staff within Adult Social Care. There were a wide variety of stalls (internal and external). Support from our Occupational Health team was provided for flu vaccines, health checks. Two workshops took place along with small pampering kits for attendees. **Further Actions** • Develop a workforce Action Plan - include external market. • Recruitment Events (exploring opportunity for joint partnership recruitment with health colleagues). • Succession planning for staff. • Developing Career Pathway Routes. • Ensure we use the recruitment materials on the ASC website. • Considering other mediums for advertising i.e. social media for specific vacancies were currently unable to recruit to.	**1st line** HR related KPIs and data Appraisal process **2nd line** Employee Engagement Survey National Minimum Data Set for social care Benchmarking analysis

| | | | | | | • Liaising with Council's Occupational Health and Wellbeing specialists to arrange drop-in sessions for managers.
• 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.
• Ensure absence management activities are aligned with the corporate absence review. | |
15	**Medium Term Financial Strategy (MTFS), Central Government Funding and Resource Allocation** 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. 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. Risk Area – All Council Services Risk owner – Alex Thompson, Executive Director of Finance and Transformation Cabinet Member: Councillor Paul Moore **Objectives impacted: All**	*	*	*	*	* 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. 		2025/26	2026/27	2027/28 Onwards
Delivery of the Medium-Term Financial Strategy (MTFS)	🟩	🟧	🟧	 **Current and Ongoing Controls** • 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, in 2023/24 and in 2024/25. • 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. • A balanced budget for 2025/26 was approved by Council on 25ᵗʰ February 2025 and included savings totalling £19m. • 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. • 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. • 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. • 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. • 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. • LG Futures have been commissioned to provide financial benchmarking data, including assumptions on grant income in future years, • 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. • 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. • The MTFS position was reported to, and discussed with, Leadership Team on several occasions during the Autumn and Winter of 2024/25, and Directors were fully engaged in the process of generating savings proposals to balance the budget gap in 2025/26. A budget timetable was in place for 2025/26 which included regular sessions with Leadership Team and Wider Leadership Team, and consultation with key external partners. • Every savings proposal is supported by a business case document setting out how the saving will be delivered. • Several Cabinet workshops were held during the Autumn and Winter of 2024/25 to engage Cabinet in the MTFS process and to ensure that elected members were willing to take each of the proposed savings forward for public consultation. • A further iteration of the MTFS was produced following the Final Settlement, during February 2025. • The MTFP model will be rolled forward during June 2025 to begin the next iteration of the MTFS cycle. **Further Actions** • Use of benchmarking data to help identify opportunities for efficiencies, savings and service improvements. • 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.	**1ˢᵗ line** Business case templates – Savings Proposals **2ⁿᵈ line** Budget and Corporate Scrutiny Board Star Chambers **3ʳᵈ line** External Audit CIPFA financial management review LGA Corporate Peer Review Grant Thornton Value for Money Governance Review - Follow Up-December 2022 LG Futures benchmarking data
16	**Budget Monitoring and Management** 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).	*	*	*	*	* 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. The risk profile for the 2024/25 financial year, in relation to a potential overspend of the Council's budget, was as follows: | Monitoring Period	2024/25											
	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
---	---	---	---	---	---	---	---	---	---	---	---	---
Revenue Budget Monitoring Position	⬜	🟧	🟧	🟧	🟩	🟩	🟩	🟩	🟩	🟩	🟩	🟩	 **Current and Ongoing Controls** • 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.	**1ˢᵗ line** Assigned budget holders **2ⁿᵈ line** Leadership Team Budget and Corporate Scrutiny Board **3ʳᵈ line** External Audit Annual Internal Audit review-budgetary control

	Risk Area – All Council Services Risk owner- Alex Thompson, Executive Director of Finance and Transformation Cabinet Member: Councillor Paul Moore **Objectives impacted: All**					• 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. • 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 • 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. • 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. • Heads of Finance Business Partnering collate information for all directorates, challenging and checking assumptions with Finance Business Partners. • 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. • 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. • 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. • 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. • 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. 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. **Further Actions** • Involving budget managers in the budget setting process will ensure that they understand their budget figures and how they have been developed. • Introduction of budget monitoring within Oracle Fusion in the future, which will provide each budget manager with 'real time' access to their area's budget and spend data. • 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.	
17	**Housing Transformation.** 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. Risk Area – Housing Risk Owner – Alan Lunt, Executive Director - Place Cabinet Member: Councillor Vicki Smith **Objectives impacted: 4**	12 (red)	⬇	9 (amber)	6 (green) December 2025	**Current and Ongoing Controls** • Self-assessment completed against consumer standards with improvement actions embedded in the wider Housing Improvement and Transformation Plan • 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. • Third party audit to ensure compliance with documentation. • 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. • Monthly co-regulatory progress meetings with the Regulator for Social Housing • Risk reflects the C3 regulatory judgement issued by the Regulator for Social Housing in October 2024 and progress made on delivery of the Housing Improvement and Transformation Plan	**2nd line** External consultant acting as our critical friend to provide external validation on compliance with the consumer standards. **3rd line** Internal audit programme agreed. Co-regulatory progress meetings with the Regulator for Social Housing
18	**Homelessness and Temporary Accommodation.** 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&B accommodation for longer than 6 weeks. Risk Area – Housing Risk Owner – Alan Lunt, Executive Director - Place Cabinet Member: Councillor Vicki Smith	16 (red)	⬇	12 (red)	9 (Amber) June 2025	**Current and Ongoing Controls** • Homelessness and Rough Sleeper Strategy revised in 2022, • Service Operating model focuses on early intervention and prevention. • Range of interventions in place to prevent homelessness from the private rented sector, • Procurement of new contract for Temporary Accommodation delivered in 2023 in addition to increasing the size of own stock provision. • Canvassing for uplift on Local Housing Allowance to be increased annually in line with inflation. • Needs Assessment and Procurement of new Supported Housing Contracts completed in 2024. • Mobilisation of plans to convert a second former Extra Care Scheme from single person TA to family TA. • Mitigations put in place and availability of additional homeless prevention grant has assisted to reduce risk. **Further Actions** • Canvassing for changes to Homeless Prevention Grant formula which will see a 50% reduction in service provision in 25/26 if not amended. • Additional procurement in progress for interim accommodation to reflect longer TA placements. • Private Rented Sector – rent top ups to prevent homeless presentations where there is an affordability gap and risk of homelessness	Ministry of Housing, Communities and Local Government Advisory meetings held quarterly (3rd level).

Risk Ref	Risk Title and Description	Previous score (Jan 2025)	Movement in risk score	Current risk score (May 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)
	Objectives impacted: 4						
19	**Continuous Improvement** 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. Risk Area – All Council Services Risk Owner – James McLaughlin, Assistant Chief Executive Cabinet Member: Councillor Kerrie Carmichael, Leader of the Council **Objectives impacted: All**	9 (amber)	⬇	6 (green)	4 (green) June 2025 Achieved	**Current and Ongoing Controls** • 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. • Review of Governance and Decision Making built into Corporate Transformation Programme. • The appointment of a permanent Strategic Leadership Team has been concluded • Performance Board meets quarterly to review KPIs in the new Council Plan and People Strategy, external contractual arrangements and Member Casework. • Activity from the former Improvement Plan embedded within the Council's Council Plan and AD Business Plans • 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. • Arrangements for scrutiny consideration of the Council's key contracts is in progress. • 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) • LGA Peer Review of HR & OD identified several areas for improvement and work is underway now to establish a new Target Operating Model for the service, modernise the structure and introduce a Chief People Officer to ensure that the needs of leadership and management to modernise and effectively run the organisation are met by HR & OD. • Introduction of new Voluntary Sector Grants Board to provide 'check and challenge' on the award of grants to and commissioning of VCS organisations in the borough. **Further Actions** • Ongoing implementation and monitoring of the progress made against the plans. • Demonstrating evidence of sustainable and continuous improvement • Review to address key and improvement recommendations from Grant Thornton's 2023 follow up review. • LGA Corporate Peer Challenge planned for January 2025 • 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. • Establishment of new Service Director tier of leadership in July 2025 for ACE, Finance & Transformation and Place, with proposals for revised senior leadership structures for Adult Care & Public Health and Children & Education to be considered by Members later in 2025	**1st line** Council Plan **2nd Line** Reports to Performance Board, Cabinet and Budget & Corporate Scrutiny Management Board on quarterly basis Audit and Risk Committee **3rd line** Grant Thornton Value for Money Governance Review - Follow Up- December 2023
20	**SEND – Placements and Transport** If the Council does not consider options on how to manage: A) the increasing upwards trajectory of demand in respect of SEND Travel Assistance B) both demand and cost of SEND placements there will significant impact on the Council's budget and the High Needs Block Risk Area – Children's Services Risk Owner – Sally Giles, Director of Children and Education Cabinet Member: Councillor Jalal Uddin **Objectives impacted: 1**	9 (amber) 16 (red)	⬌	9 (amber) 16 (red)	6 (amber) August 2025 (amber) Oct 2025	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. 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. **Further actions:** • Complete the implementation of the **locality-based inclusion model**, ensuring structures are in place for local decision-making, needs-led support planning, and integrated delivery across education, health, and care services. • Finalise the **two-year advanced planning cycle** for specialist placements to provide clear timelines for commissioning, capital planning, and preparation of transport arrangements. • Launch a **borough-wide audit** of current specialist provision to identify gaps in local capacity and inform the development of Focused Provisions (FPs) and informal FPs. • Deliver the **interim place increase** for September 2025, ensuring timely consultation with parents and schools, and alignment with forecasted need. • Strengthen the use of **live data dashboards** to track EHCP demand, placement pressures, and transport spend in real-time, enabling early intervention and more responsive planning. • Develop a **multi-agency specialist commissioning framework**, aligned to locality priorities and needs assessments, to reduce reliance on high-cost independent placements. • Expand the **travel training offer** across secondary and post-16 settings, supported by a refreshed policy on personal transport budgets and a communications campaign for families. • Review current **workforce capacity** across ILS and SEND transport teams, identifying a restructure that will sustain delivery of both statutory and preventative functions. • Engage in **regional commissioning conversations** to explore shared solutions for complex high-cost placements and pooled transport routes across borders. • Embed learning from recent casework and complaints to inform continuous improvement in placement planning and transport coordination. **Current and Ongoing Controls** 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. • More competitive market with 29 operators now on the FPS • Migration from legacy framework to FPS contracts has helped to reduce the average cost per head to below £13k pa, reaming 2 will move August 25 • Single school contracts continue to offer better VFM • Improved data supporting better demand and financial forecasting • Robust contract management ensuring no decline in service provision • Focus on reducing demand for transport and increasing children accessing travel training and families taking up the offer of parent mileage of a personal transport budget • 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.	**1st line** Key Performance Indicators Budget Monitoring **2nd line** Regular updates to leadership team Corporate Transformation Board **3rd line** Ofsted monitoring visits Areas SEND Inspection July 2023

Risk Ref	Risk Title and Description	Previous score (Jan 2025)	Movement in risk score	Current risk score (May 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)
						Further Actions • Increase the number of specialist places in Sandwell schools to enable children to attend their local school • Continue to develop the FPS to provide greater control for the Council and reduce the risk of increasing costs • Continue to work with market to deliver a VFM high quality service. • 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 • Review the Council's post 16 offer • An improvement plan has been developed to ensure that systems, processes, and structures in Inclusive Learning Services are robust, streamlined and effective. • Implementation of a locality-based inclusion model across Sandwell to support earlier intervention, strengthen local support infrastructure, and reduce escalation to statutory pathways. • Two-year forward planning for specialist placements, aligned with a comprehensive needs assessment, to allow sufficient lead-in time for place development and to inform commissioning intentions. • Interim increase in specialist provision for September 2025, including both special school and additionally resourced provision, to reduce dependency on high-cost independent placements and ensure pupils can be educated locally. • Development of a specialist place planning strategy, co-produced with partners, to manage future growth more sustainably and reduce the need for out-of-borough placements. • Enhanced joint working across education, health and care to align commissioning, improve pathway coordination, and ensure provision is tailored to need at both individual and area levels.	