

Detailed Risk Report (incl Control Measure Target Date)

Risk Ref	Risks	Triggers	Consequences	Existing Control Measures	Current Risk			Target Risk			Responsibility	CPT
					L	I	Total	L	I	Total		
CSD0016	Death or serious harm to a child that was or should have been in receipt of services, either from the council or a partner agency. There is an on-going need to ensure that services to all vulnerable children and young people have a focus on safeguarding and prevention of harm.	Our most recent Ofsted report (June 2019) rates Children's Social Care and Early Help service's as "Good". However, there will be a need to regularly review and scrutinise the quality of services for vulnerable young people. This scrutiny and challenge will need to have a focus on; <ul style="list-style-type: none"> • Overall management oversight and quality of supervision. • Compliance with core statutory and local requirements. • Adherence to key safeguarding thresholds. • Regular assessments of cases, and emerging /changing risks. • Strong planning for children, with regular reviews to avoid drift and delay. • Maintaining strong quality assurance and auditing mechanisms. 	<ul style="list-style-type: none"> • Harm to individual Children and young people being left in situations of risk and or unassisted harm. • Poorer than expected outcomes for a child. • Poor audit/review findings • Reputational damage to the council. • Poor Staff development and competence. • Poor Quality assurance and Performance Management • Loss of experienced professional staff. • Potential for legal proceedings against the council leading to financial loss 	<p>Monthly meeting of the Continuous Improvement Board, chaired by the DCS, and involving the Lead member.</p> <p>The Tower Hamlets Children's Safeguarding Partnership, delivering the statutory multi-agency oversight of safeguarding.</p> <p>The Tower Hamlets Safeguarding Children's Partnership is jointly led by the Council, Police and CCG, and benefits from the support and challenge of an Independent Scrutineer. The Partnership provides routine oversight of multi-agency data and quality assurance findings.</p> <p>Monthly service level performance meetings held by the Divisional Director.</p> <p>Underpinned by monthly Performance Surgeries held by each Head of Service.</p> <p>Practice Week which is held twice a year (May and November) which involves all Corporate Directors and members.</p>	5	5	25	4	4	16	James Thomas	People Are Aspirational, Independent And Have Equal Access To Opportunities.

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								<p>by summer 2022, which will provide external scrutiny of our safeguarding practice against the national inspection benchmarks. Annual Conversation with Ofsted indicated this will be within 12 months from July 2021. Focused Visit completed in July 2022 - letter to be published 31/8/22.</p> <p>James Thomas</p> <p><u>Required Control Measure</u> Target Date: 31/03/2023</p> <p>Tower Hamlets Safeguarding Children's Partnership and increased quality assurance.</p> <p>The THSCP has planned for 21/22 and 22/23 an increased level of quality assurance, including multi-agency case audits and Safeguarding Child Practice Reviews.</p> <p>On track.</p> <p>James Thomas</p> <p><u>Required Control Measure</u> Target Date: 31/03/2023</p>							
ORG0027	There is an ongoing risk of a cyber attack and/or major loss of IT.	Cyber attacks could include ransomware, denial of service, social engineering, phishing, malware and/or an active attack exploiting network security vulnerabilities. Attacks could be enabled through miss-sent emails, inappropriate sharing, insecure design, inappropriate access, introduction of unauthorized software to the network, users	Significant and prolonged loss of IT services. Inability to deliver critical and essential services. Failure to comply with statutory duties or other legal responsibilities. Breach of data protection legislation Financial loss Reputational damage	Current activity Internal internal and external reviews. Internal vulnerability scanning is on-going, occurring every week and the critical / high vulnerabilities discovered continue to be escalated for urgent remediation. Annual independent penetration tests. Implementation of a SIEM solution Recruiting additional specialist resources to support the SIEM. Take a risk-based approach to data security. Embed the risk assessment culture within service delivery.	4	5	20	Zero Tolerance to unsupported software in the council live environment without a mitigation plan in place. Recent events with a number of local authorities have led to severe disruptions and impacted their ability to deliver key services. In an attempt safeguard LBTH from such an event a Zero Tolerance approach to "unsupported software" will be adopted. This will include: - Run weekly vulnerability scan (NESSUS) - Identify and publicise any	4	3	12	Adrian Gorst			

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		clicking on phishing scam email links, and/or divulging sensitive information		<p>Ensure architectural decisions taken are supported by adequate risk assessments.</p> <p>Ensure Policies are aligned with identified risks and communicated effectively.</p> <p>Ensure policy exceptions are supported with fully documented and signed off risk assessments and controls are continually monitored</p> <p>Review of BCP</p> <p>At the request of the Corporate Directors of Health, Adults and Community, Internal Audit reviewed a sample of BCP's in quarter 4 of 2021/22 to form a view on whether the BCP's adequately address a complete loss of IT infrastructure for a prolonged period. The outcome was complete and was presented to CLT members and the CCB in June 2022. Actions and recommendations shared to inform ongoing improvements.</p> <p>Proposed follow up of updates / improvements during 2022/23 IA Plan and beyond to maintain effectiveness of BCP plans.</p> <p>Cyber Security/Attack Exercise</p> <p>The Council has run a table top cyber security/attack scenario with both CLT and the CCB. Lessons learned have been identified and actions will be assigned to responsible officers and monitored by the CCB.</p>				<p>systems that have unsupported software installed</p> <p>- For those systems identified:</p> <p>- If non-production, disable immediately</p> <p>- if production, Applications Team to work with the Service and Information Security to identify the most appropriate course of action.</p> <p>11 Oct - moved owner to MU, remaining list of unsupported software to be supplied and action plan agreed to address by end of FY</p> <p>Mary Umoh</p> <p><u>Required Control Measure</u></p> <p>Target Date: 31/03/2023</p> <p>Governance</p> <p>The terms of reference for the Strategic Information Governance Board need to be reviewed and agreed by CLT. Consideration to include oversight of cyber security matters. The action is being incorporated into the IG Review which is progressing and reporting into the Support Services Board.</p> <p>New Head of IG starts in Oct and full review of the IGG and SIGB will be carried out</p> <p>Raj Chand</p> <p><u>Required Control Measure</u></p> <p>Target Date: 31/03/2023</p> <p>Information/Cyber Security Incident Response Procedures</p> <p>The Council's Information/Cyber Security Incident Response Procedures need to be reviewed and updated with key details .</p>				

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This has been updated to include the cyber security mailbox as first point of contact. Adding individual names would need the document to be updated regularly as staff leave and so this should be the roles rather than specific names and contact information. Roles to be included to be discussed at the most appropriate forum, tbd.

12/01/23 - independent assessment due Q4 FY22/23 which will evidence be used to evidence the CM

Mary Umoh

Required Control Measure

Target Date:
19/01/2023

Promote Cyber Security awareness using Training and Campaigns

- one of the measures is to ensure that cyber security training is always part of the mandatory training required by all staff. Progress of mandatory training is monitored at DLT and CLT levels

- in 2023 the council cyber security campaign culminating in National Cybersecurity Awareness Month in October

Mary Umoh

Required Control Measure

Target Date:
31/12/2023

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RS0056	The Council may significantly overspend its budget, fail to deliver savings and continue to rely on dwindling reserves. As of September 2022 the Council is forecasting a £3.1m overspend against its budget for the year with savings at risk of non delivery. Reserves remain robust but there is a risk that the Medium Term Financial Strategy may require a significant draw down of reserves. Reserves can only be used once and therefore should not be used to plug permanent budget requirements.	COVID-19 Virus residual impacts and associated increase in costs. Loss of income in particular council tax, business rates and leisure events. Poor budget management Failure to deliver savings Demographic pressures in Adult Social Care, SEND related pressures in Childrens and Culture, Unfunded discretionary expenditure utilizing temporary reserves.	Significant financial losses, overspent budgets, further drawn down on reserves.	<p>Financial Measures</p> <p>CLT and SLT have prepared savings proposals to deliver savings across 9 themes which were presented Members for their agreement:</p> <ol style="list-style-type: none"> 1. New ways of working from the pandemic 2. Managing demand by enabling people to help themselves 3. Streamlining our back office 4. Greater use of community assets 5. Digital 6. Buildings 7. Non- statutory services 8. Joining up services 9. Headcount reductions <p>Financial Actions</p> <p>Increased focus on budget management. Budget Managers Handbook Issued. All budget managers directed by CLT to remain in budget. High risk budgets reviewed by the Corporate Director Resources or the Divisional Director of Finance, Procurement and Audit. Redoubled efforts to deliver previously agreed savings proposals.</p>	5	4	20	<p>Monitoring and Control</p> <p>Continual focus on budget management. Closely tracking delivery of savings and identifying alternatives if proposals become undeliverable. Regular budget reporting to CLT, Portfolio Leads, MAB and Cabinet.</p> <p>Allister Bannin</p> <p><u>Required Control Measure</u></p> <p>Target Date: 31/03/2023</p>	4	3	12	Nisar Visram			
RSB0023	There is a risk that the statement of accounts will received a qualified opinion for 2020-21.	External audit of the statement of accounts and the subsequent findings/outcome.	Qualified opinion on statement of accounts. Reputational damage to the Council.		4	4	16	<p>Improvement Plan</p> <p>An extensive improvement plan is in place and being actively delivered and monitored. Progress will be reported to CLT and the Audit Committee.</p> <p>Ahsan Khan</p> <p><u>Required Control Measure</u></p> <p>Target Date: 30/11/2022</p>	2	2	4	Nisar Visram	A Dynamic Outcomes-Based Council Using Digital Innovation And Partnership Working To		

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ASD0015	Death or serious harm to a vulnerable adult who was or should have been, in receipt of services, either from the council or a partner agency.	There is a failure of one or more of the controls in place to identify the degree of risk to a vulnerable adult (multi-agency safeguarding procedures) Poor practice, insufficient information sharing and/or inadequate management oversight. Failure of quality control systems. Service user fails to work to agreed partnership / agency arrangements. Poor communication and partnership work. Poor resourcing of service areas against increased demand. Local authority contracted out service do not have sufficiently robust safeguarding arrangements.	Harm to an individual. Reputational damage to the Council. Potential for legal proceedings against the council leading to financial loss. Loss of confidence in safeguarding capability.	Safeguarding issues as part of contract management procedures Procedures overseen by Joint Director for Integrated Commissioning - contract management procedures continue to focus on safeguarding. Care Quality Commission embargo list used. This list is available from the Care Quality Commission highlighting all providers where the CQC has raised concerns. London ADASS branch circulate any service suspensions or restarts due to safeguarding concerns and these are passed to the Brokerage service. Provider Concerns and interface with Adult Safeguarding is a standard agenda item at Joint Adult Social Care and Integrated Commissioning Senior Management Team meeting. Failed visit policy and procedures in place. The Failed visits policy and procedures were originally agreed in 2018 and have been reviewed over the last year. They are currently in use and should be reviewed and amended if necessary annually.	3	5	15	2	5	10	Denise Radley	People Are Aspirational, Independent And Have Equal Access To Opportunities.

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Katie O'Driscoll
Required Control Measure
Target Date:
28/02/2023
 5 year (2019 – 2024)
 Safeguarding Adults Board Strategy

The actions within the SAB strategy aim to mitigate the risks associated with safeguarding. These are linked to the principles of Safeguarding with is Empowerment, Prevention, Proportionality, Partnership, Protection and Accountability. They are also linked to the principles of Making Safeguarding Personal. The SAB will be focusing on 3 key priorities relating to transitions, self neglect and homelessness.

Katie O'Driscoll
Required Control Measure
Target Date:
28/02/2023
 Safeguarding Adult Reviews Action Plan - implementation of recommendations of all SARs

We have a Safeguarding Adults Review Tracker in place to monitor and oversee the implementation of actions arising out of Safeguarding Adult Reviews.

This is monitored for the Safeguarding Adult Review sub group and Board.

Katie O'Driscoll
Required Control Measure
Target Date:
28/02/2023

Risk Ref	Risks	Triggers	Consequences	Existing Control Measures	Current Risk			Target Risk			Responsibility	CPT
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PLC0013	Following the Grenfell Fire tragedy residents of tower blocks in the borough are not safe or do not feel safe from fire following reassurance, advice, interim measures and completed, in progress or scheduled remedial actions to improve fire safety.	Accountability for fire safety is not correctly designated, communicated and understood Fire Risk Assessments: * are incomplete, inadequate or not carried out in accordance with the latest advice from DCLG and fire and rescue services * are not published in accordance with the Mayor's commitment * do not include the time limits on recommendations Fire Risk Assessment Action Plans: are not produced and/or delivered within appropriate timescales Limited current contractor supplier chain for scale of identified fire safety works Constrained and limited ability for Tower Hamlets Homes to complete all the Fire Risk Assessment work identified in the new round of comprehensive Fire Risk Assessments Unable to justify block prioritisation policy for programmes of Fire Risk Assessment works Leaseholders do not fit fire rated flat entry doors (ALL flat entrance doors in a block will need to be compliant to achieve	Loss of life Loss of housing stock Lobbying and/or protesting The council and local housing management organisations lose the trust of residents Individual prosecution under a number of Acts of Parliament and common law offences with potential penalties including unlimited fines and a maximum of life imprisonment Corporate prosecution with potential penalties of unlimited fines, remedial orders and publicity orders Adverse national media coverage Uninsured financial loss Council perceived as not having fulfilled statutory duty to keep local housing conditions under review	Work with MHCLG to ensure owners of private residential tower blocks are taking measures to ensure their residents safety Officers within the Council, representing Environmental Health, Planning and Building Control and Housing and Regeneration meet weekly at Fire Safety meeting, to discuss progress with the remediation of ACM from tall buildings, this also includes progress on responses to EWS survey. Information from the EWS survey are inputted onto the the Department for Levelling Up's (DfLU) DELTA system and details of information received are sent to a Technical Officer in the Building Control Team for analyses. Council Officers are in weekly contact with the GLA on the progress of each development's individual grant application to remediate ACM from particular buildings and this is reported back to the Fire Safety Meeting. This has now progressed to EWS work and applications to the Department for Levelling Up's (DfLU) BSF fund to remediate materials of concern other than ACM. Likewise Officers are in regular dialogue with DfLU on buildings which are of concern and also to discuss various freeholders and managing agents who are not communicating well or slow in responding for information requests.	3	5	15	1	5	5	Ann Sutcliffe	A Borough That Our Residents Are Proud Of And Love To Live In.

Required Control Measure
Target Date:

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		<p>good fire compartmentalisation and a 'Tolerable' fire safety standard)</p> <p>Fire safety measures are uncoordinated</p>		<p>Monthly meetings are held with DfLU and Council officers to monitor progress on each building of concern.</p> <p>Tower Hamlets Housing Forum , Council Officers and the London Fire Brigade have a close working partnership on resident consultation.</p> <p>LBTH Client Management</p> <p>Fire risk assessments for all buildings are up to date and FRA as fire risk assessor UKAS credited.</p> <p>There are</p> <p>No building categorised as substantial or intolerable level of risk.</p> <p>All high-rise buildings surveyed in early 2020 and none has been identified with High Pressure Laminate (HPL) or Aluminium Composite Material ACM cladding. Cladding on 2 tower blocks (malting & Brewster), where there were concerns, has been removed already.</p> <p>Joint working with THH in preparation of the Building Safety Bill including, a pilot of a building safety case, ICT preparation, and a paper which will spell out the roles and responsibilities including those of the Accountable Person and the Building safety Manager is earmarked for November Cabinet.</p> <p>A leading fire engineering consultancy has reviewed all buildings over 6 storey and identified those that may present a greater level of risk. Subject to approval of LBTH, we will shortly carryout external wall surveys on these buildings (by April 2022).</p> <p>Procurement is underway to</p>								

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				<p>appoint more permanently a fire engineering consultant to complete fire strategies, means of escape reports and external wall surveys for all other buildings that require one.</p> <p>THH regularly communicate with residents through newsletters and resident association presentation in conjunction with the London Fire Brigade. We also meet with the LFB on a regular basis.</p> <p>THH/LBTH capital investment programme has been reviewed and refocussed the works programme to accelerate front door replacements and make provision for major works arising from EWS surveys and Type 4 fire risk assessments.</p> <p>THH report progress on major works projects as well as more broadly on compliance at regular liaison meetings with the LBTH client team.</p> <p>Fire Safety is also regularly discussed at QSM and the Mayor's Housing meeting</p> <p>A monthly compliance dashboard is in place that covers a wide range of compliance related KPIs including those relevant to fire.</p>								

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ASD0038	<p>There is a risk that the Council will fail to comply with its obligations in relation to the Protection of Freedoms Act 2012 and therefore failing to meet the Code of Practice compiled under that Act by the Home Office Surveillance Camera Commissioner (SCC) for the operation of video surveillance systems. The Council may also fail to meet the requirements of the Data Protection Act 2018 related to the use and management of video surveillance systems.</p>	<p>A lack of appropriate governance, policy and standard operating procedures. No asset registers for surveillance systems. Out of date or missing Data Processing Impact Assessments No SLAs with major stakeholders such as the Police and Transport for London A lack of compliance with agreed governance, policy and procedures. An inspection by the Surveillance Camera Commissioner. An inspection by the Information Commissioner. A freedom of information request.</p>	Financial, legal and reputational.	<p>Service Actions Ensure an updated DPIA is in place for all departmental VSS systems. Ensure DPIAs are quality assured by Information & Governance Team and signed off Ensure robust information sharing agreements are in place where appropriate for all departmental VSS Ensure Asset management registers are maintained. Ensure DLTs and Directors are appraised of progress and risks.</p>	3	4	12	<p>Improvement Action Plan Completion Update the action plan to ensure progress against the requirements & regulations - this is a cross-Council action plan as services sit within multiple directorates. Draft the Council policies and procedures. All the client departments such as Parks, FM, Parking and CCTV will need to ensure that they implement the action plan, policies and procedures. The action plan will be monitored by the Information Governance Board. Each client department to nominate a lead, a Single Point of Contact (SPOC) who will be responsible for all operational matters relating to surveillance cameras and they will act as the main contact point for anything related to surveillance camera systems. They SPOCs will support the SRO regarding compliance with Protection of Freedoms Act. Joseph Lacey-Holland <u>Required Control Measure</u> Target Date: 31/03/2023 Service Actions Ensure an updated DPIA is in place for all departmental VSS systems. Ensure DPIAs are quality assured by Information & Governance Team and signed off Ensure robust information sharing agreements are in place where appropriate for all departmental VSS Ensure Asset management registers are maintained.</p>	2	2	4	Denise Radley	A Dynamic Outcomes-Based Council Using Digital Innovation And Partnership Working To

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								<p>Ensure DLTs and Directors are appraised of progress and risks. Peter Allnutt</p> <p><u>Required Control Measure</u> Target Date: 31/03/2022</p> <p>Service Actions</p> <p>Ensure an updated DPIA is in place for all departmental VSS systems. Ensure DPIAs are quality assured by Information & Governance Team and signed off Ensure robust information sharing agreements are in place where appropriate for all departmental VSS</p> <p>Ensure Asset management registers are maintained. Ensure DLTs and Directors are appraised of progress and risks. Michael Darby</p> <p><u>Required Control Measure</u> Target Date: 31/03/2022</p> <p>Service Actions</p> <p>Ensure an updated DPIA is in place for all departmental VSS systems. Ensure DPIAs are quality assured by Information & Governance Team and signed off Ensure robust information sharing agreements are in place where appropriate for all departmental VSS</p> <p>Ensure Asset management registers are maintained. Ensure DLTs and Directors are appraised of progress and risks. Chris Smith</p> <p><u>Required Control Measure</u> Target Date: 31/12/2021</p> <p>Service Actions</p>							

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Ensure an updated DPIA is in place for all departmental VSS systems.
 Ensure DPIAs are quality assured by Information & Governance Team and signed off
 Ensure robust information sharing agreements are in place where appropriate for all departmental VSS
 Ensure Asset management registers are maintained.
 Ensure DLTs and Directors are appraised of progress and risks.
Sam Brown
Required Control Measure
Target Date:
31/03/2023
 Service Actions

Ensure an updated DPIA is in place for all departmental VSS systems.
 Ensure DPIAs are quality assured by Information & Governance Team and signed off
 Ensure robust information sharing agreements are in place where appropriate for all departmental VSS
 Ensure Asset management registers are maintained.
 Ensure DLTs and Directors are appraised of progress and risks.
 A new DPO has been appointed and a new Head of IG is starting on 17th Oct. This action will be fully reviewed then.
Raj Chand
Required Control Measure
Target Date:
30/12/2022

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ASD0047	There is a risk of a significant health impact on the community in the short, medium and long-term from Covid-19 alongside seasonal flu and in the context of a challenging Winter period and cost of living crisis.	Low uptake of the flu/Covid vaccination in Tower Hamlets. Low capacity from NEL to provide vaccination support, including community clinics Covid-19 and variants of concern - whilst current rates of infection are falling, this may change. Winter is likely to be a difficult period given the current cost of living crisis on people keeping warm, well and safe combined with the risks around Covid and flu as above.	Increasing hospitalisations, care needs and deaths. Business continuity impact from staff absence. Impact on BAU services		3	4	12	Vaccination Programme Vaccine Delivery Plan for Flu & Covid underway through community pharmacies and East London Vacc. Centre. House bounds and care-based settings supported within their homes. Find and Treat service to support residents living in hostels and homeless settings. High profile vaccination event at East London Mosque. Vaccinations being delivered within special schools. Somen Banerjee <u>Required Control Measure</u> Target Date: 31/01/2023 Communications campaign & awareness-raising Planned campaigns around vaccination and keeping well in Winter and consideration of how these can best be targeted in the borough to ensure groups who may be less able to receive the messages and those hesitant around vaccines are supported to protect themselves this Winter. Bespoke community engagement and comms programmes to support targeted groups including: Faith / Community / Special Schools / Transitional Housing Somen Banerjee <u>Required Control Measure</u> Target Date: 31/03/2023	3	3	9	Somen Banerjee	People Are Aspirational, Independent And Have Equal Access To Opportunities.		

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COVID0001	Risk to essential service delivery, the workforce and public safety as a result of the coronavirus and variants of concern.	Third wave of the virus and/or new variants. Vaccines are ineffective against new strains. Vaccine take up is low. Increase in infection rates. National or local restrictions on movement and/or social contract are re-introduced.	Death of members of the public, service users and staff. NHS and hospitals unable to cater for increase in population requiring hospitalisation and intensive care. Collapse or significant reduction in public services including local government, significant down turn in the economy.	Local Outbreak Management Plan The Council has prepared and successfully implemented a local outbreak management plan (surveillance, testing, vaccination, prevention & outbreak management, equalities, communication & engagement) as well as clear and robust governance made up of CLT Gold, Health Protection Board and Local Engagement Board and workstream groups, effective community mobilisation, visible professional and political leadership, data flow from national system, collaboration with London Coronavirus Response Cell and North East London Incident Management Team, and a communications plan. The plan now has a status of business as usual and governance is via the ongoing Health Protection Board chaired by the Director of Public Health. Separate risk registers stood down and integrated into main JCAD. Stepped up Response In response to the Omicron variant and increased infection rates, the Council stepped up its local outbreak management plan to manage and mitigate the situation, including the GOLD meetings. This included staff working from home whenever possible/practical, requesting two mobile testing units to be added to capacity, providing lateral flow tests across the borough in addition to community pharmacy provision and home test kits that could be ordered through the national system. There was an ongoing communications and engagement programme particularly	3	4	12							Will Tuckley	A Borough That Our Residents Are Proud Of And Love To Live In.
								<u>Required Control Measure</u>							
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				<p>working with groups that were disproportionately impacted by the pandemic and are at particularly high risk.</p> <p>Ongoing Monitoring CLT and Public Health will continue to monitor the situation and closely and step up the Councils response as and when required. Monthly monitoring by CLT has continued and in October we have seen a rise in infections with anticipated risks over Winter. Target date for ongoing monitoring extended to March 2023 to cover the Winter period. Increased review frequency to monthly.</p>								
DRCPCD0062	Town Hall - delay with completion beyond 2022 - impacting fit out and moves programme by Dec 2022	Programme delays in completing main build works.	Delay in achieving Practical Completion, delaying fit out and moves programme from Mulberry Place by the end of Dec 2022.	<p>Programme review with BYUK and EA tracking milestones on Current programme is for Dec 2022 completion of main works - fortnightly review with project team and EA. Impact to Moves is tracked and mitigative measures taken Building completion projected end of Jan 2023 - staff moves from Jan 23 to Feb 23.</p> <p>Co-ordination with contractor on site 1st staff moves from 16.01.23</p>	3	4	12				Yasmin Ali	A Borough That Our Residents Are Proud Of And Love To Live In.

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ICT0085	<p>Electricity Supply Emergency Code (ESEC) - Controlled blackouts this winter</p> <p>If a prolonged electricity shortage affects a specific region, or the whole country, electricity rationing may be necessary. The Electricity Supply Emergency Code (ESEC) outlines the process for ensuring fair distribution nationally while still protecting those who require special treatment, using a process known as 'rota disconnections'.</p>	<p>3.1 In an electricity supply emergency it may be necessary to restrict customers' consumption of electricity. Restrictions over the longer term can be achieved by one or more of the following methods:</p> <ul style="list-style-type: none"> Public appeals by the UK Government for voluntary restraint; Orders or directions under the Energy Act 1976 requiring restrictions on consumption by industry, commerce and other undertakings; Directions under the Energy Act 1976 or the Electricity Act 1989 requiring rota disconnections and associated restrictions. <p>3.2. Orders and directions under the Energy Act 1976 or the Electricity Act 1989 to restrict consumption by industrial, commercial and other sites may contain a schedule exempting certain premises and purposes from the scope of the order or direction. The categories exempted in these schedules are likely to be more extensive than the categories of sites protected from rota</p>	<p>Winter Blackouts, option 3</p> <p>Not nationwide</p> <p>Predefined periods - 3 hours</p> <p>Notice in advance</p> <p>Target to reduce consumption by 5%</p> <p>Protected sites; hospitals oil refineries etc.</p> <p>Households – 3 levels</p> <p>3 times a week</p> <p>6 times a week</p> <p>Up to 27 hours in a week</p>		3	4	12	<p>Communication Plan</p> <p>Build on the significant work to date to remind staff that access to council systems is not dependent on location, this has been the case over the covid period</p> <p>Adam Evans</p> <p><u>Required Control Measure</u></p> <p><u>Target Date:</u></p> <p>Business Continuity Plans</p> <p>Work with CCB to to be aligned with the Council Approach to planned outages</p> <p>CCB to promote Service owners to update their BC plans</p> <p>When the notice is given (up to 48 hours) message to the relevant team the working measures to be adopted - outages will be in 3 hr blocks</p> <p>Adam Evans</p> <p><u>Required Control Measure</u></p> <p><u>Target Date:</u></p>	2	2	4	Adrian Gorst	

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		<p>disconnections. In order to use the powers under the Energy Act 1976 to their fullest extent, an Order in Council would need to be made and be in force before any order could be made or any directions could be given.</p> <p>3.3. One of the orders which could be made under the Energy Act 1976 to restrict the use of electricity in industrial, commercial and other premises would require consumption to be reduced by a certain percentage. (This is to be distinguished from a direction instituting rota disconnections). It is an alternative to an order which would restrict the use of electricity to specified days of the week. If a percentage reduction order was made, it might also be necessary for directions to be given to suppliers requiring them to provide information showing sites whose consumption was above a certain level, so as to enable the UK Government to monitor observance of the order.</p> <p>3.4. If the BEIS ERT considers that rota</p>										

Risk Ref	Risks	Triggers	Consequences	Existing Control Measures	Current Risk			Target Risk			Responsibility	CPT
					L	I	Total	L	I	Total		
		<p>disconnections must be introduced, the Secretary of State may implement the emergency powers in the Energy Act 1976 by making an Order in Council. Once that Order in Council is in force, BEIS can give a direction to all Network Operators affected to implement a schedule of rota disconnections across their licence area(s) throughout the period of the emergency. Under this direction and within the provisions of the Grid Code, NGESO will instruct Network Operators to restrict the supply of electricity to sites, other than Protected Sites, by rota disconnections to achieve a specified level of reduced demand. The period over which the overall process of rota disconnections continues, together with the level(s) of disconnection, will be decided by the Secretary of State in light of advice from the BEIS ERT. Subsequent changes to that period and/or level(s) of disconnection will be confirmed by the giving of an amended direction.</p> <p>3.5. A shortfall in</p>										

Risk Ref	Risks	Triggers	Consequences	Existing Control Measures	Current Risk			Target Risk			Responsibility	CPT
					L	I	Total	L	I	Total		
		available generation could initially be handled via Grid Code arrangements. If the shortfall were to worsen or be prolonged, this may make it necessary for the Secretary of State to invoke ESEC. Alternatively, the electricity supply emergency could When and how ESEC will be used dictate an orderly and planned move to rota disconnections without utilising the Grid Code arrangements if, for example, the situation developed over the weekend and it is clear that there is likely to be a substantial difference between demand and available generation on the Monday.										
ORG0026	There is a risk the Council will be unable to deliver critical and essential services.	Denial of access to, or loss of one or more of the following (4 P's): People – Example -Staffing loss due to industrial action or pandemic Places – Example - Premises/ Location unable to carry out services due to fire/flood/utility failure etc. Processes – Example - Essential Software loss due to Cyber Attack, Office Equipment, Mobile Devices or Vehicles	Loss of one or more of the 4 P's may impact on these area's - Inability to deliver, or disruption to Critical Services - Finance - Reputation - Delivery of KPI's - Safeguarding/ Health & Safety	A fully functioning and embedded Business Continuity Framework The Corporate Leadership Team has adopted a business continuity policy and civil contingencies arrangements. The development & maintenance of these arrangements is managed through the Civil Contingencies Board which is chaired by Denise Radley. The CCB meeting quarterly and more frequently when required. In 2019/20, new business continuity software (Clearview) to support directorates and services to manage key risks was implemented. This software will be upgraded to 'Castellan' during late 22/23 once all BC plans are up to date on the	3	4	12	3	4	12	Will Tuckley	A Dynamic Outcomes-Based Council Using Digital Innovation And Partnership Working To

Risk Ref	Risks	Triggers	Consequences	Existing Control Measures	Current Risk			Target Risk			Responsibility	CPT
					L	I	Total	L	I	Total		
		Providers – Example – Failure of Commissioned Providers & Suppliers		current ClearView system.								

are found, record the action that is taken to rectify.
N.B. Directors

- Approve all BC plans and reviews in their areas on time
- Ensure Service Managers take ownership of their plans, that they are updated and submitted for review every 6 months
- Confirm plans have manual workarounds in the event of failure/denial of one or more of the 4 P's
- Ensure BC Plans of commissioned providers within their areas are audited in line with the services RTO's (Recovery Time Objectives)
- Require Service Managers to attend relevant BC and ClearView training, and **Charles Griggs**

Required Control Measure
Target Date:
31/03/2023

Provision of monthly management information to DLT's, and Directors.

The CPU will provide a monthly report from the Business Continuity Management System providing relevant management information to DLTs and directors, and the provision of support to directors to achieve good levels of compliance.
Charles Griggs

Required Control Measure
Target Date:
31/03/2023

Annual Audit of Business Continuity Plans

In 2022 a consultancy review 'Testing of Business Continuity

Risk Ref	Risks	Triggers	Consequences	Existing Control Measures	Current Risk			Target Risk			Responsibility	CPT
					L	I	Total	L	I	Total		
PLC0023	Failure to prepare and take action in relation to the proposed Building Safety Bill	<p>Lack of leadership</p> <p>Insufficient resources</p> <p>Poor understanding of the requirements and consequences</p> <p>Passage of the bill is faster than anticipated</p>	<p>Potential Injury or death of residents</p> <p>Criminal and/or civil litigation for the Council and/or individual senior leadership</p> <p>Delays in construction</p> <p>Regulatory breaches</p> <p>Financial penalties</p> <p>Poor building safety</p> <p>Reputational damage</p>	<p>Research, Legal Advice and Monitoring</p> <p>Key officers are involved in researching the implications of the bill</p> <p>Legal advice has been sought</p> <p>LBTH/THH Building Safety Bill Group monthly meetings to monitor impact and progress and sub-groups to consider impacts and develop new processes.</p> <p>Liaise with London wide forums and Federation of ALMOS on implementation</p> <p>Obtain Human Resources advice when required.</p>	3	4	12	2	3	6	Ann Sutcliffe	A Borough That Our Residents Are Proud Of And Love To Live In.

Risk Ref	Risks	Triggers	Consequences	Existing Control Measures	Current Risk			Target Risk			Responsibility	CPT
					L	I	Total	L	I	Total		

legislation, with updates being shared with the relevant people/groups. New members and the Mayor have been briefed on the Building Safety Act.

c. Working with LBTH, Legal Services, CLT and Members to examine the responsibilities linked to the Bill.
 Complete: Presentations/discussion are taking place, taking into consideration the changes from the draft Bill to the Bill that was published on 5 July 2 and factsheets published in Oct 21. The Building Safety Bill received Royal Assent 28 April 22 - the Building Safety Act Working Group discusses the impacts and preparedness considering any changes from the Bill. LBTH will assist with any clarifications the Building Safety Act group require in relation to changes made to the Act when it was enacted and subsequent legislation.

d. Calculate the additional resources required to comply with the Bill when enacted
 Complete: THH and LBTH building safety bill related growth proposals for 2022/23 onwards have been approved as part of the budget setting process. Both growth proposals are for funding the new additional roles required to deliver the building safety regime. LBTH's growth proposal is for £108K for 2021/22 and £356k thereafter. THH approved growth proposal is £476k p.a

Risk Ref	Risks	Triggers	Consequences	Existing Control Measures	Current Risk			Target Risk			Responsibility	CPT
					L	I	Total	L	I	Total		

from 2022/23 onwards. In additional THH had £350k previously approved for 2021/22. Additional growth may be required in response to the Government releasing secondary legislation.

e. Consider appointing a building safety lead in the council to undertake the assurance work needed for the council to carry out its Accountable Person role. Complete: David Leslie, commenced with the Council as our Building Safety Lead. The Building Safety Lead will be responsible for the preparations for the building safety regime. Once the Building Safety Act is fully implemented the Safety Lead will oversee relevant department's/THH's delivery of aspects of the Council's building safety regime, ensuring the Council is compliant with the Act. David will be the named person (on behalf of the Council, as Accountable Person) for the Building Safety Regulator and will review all statutory returns before submission to the Regulator.

f. Consider appointing a specialist advisor for support with the Safety Case reviews. Complete: THH has procured Adelard to assist with developing the Safety Case template, provide licences and training to use their IT system and support for a period. THH will commence training with Adelard towards the end of April 22.

Risk Ref	Risks	Triggers	Consequences	Existing Control Measures	Current Risk			Target Risk			Responsibility	CPT
					L	I	Total	L	I	Total		

g. The Council's Building Safety Bill guidance will be updated regularly by Counsel. Complete: Bevan Brittan are updating their advice and providing clarifications to some queries since the Bill received royal assent on 28 April 22. Bevan Brittan has provided updated advice since the release of the Building Safety Bill on 5 July 21. A comparison to the draft bill and questions related to the Oct 21 factsheets have been provided.

h. Potentially review existing contracts to ensure they comply with the Bill's requirements. In progress: LBTH Legal has been asked to carry out the review.

i. Investigating digital storage methods to maintain the "Golden Thread of information" (GTI). In progress: Goy Roper and his colleagues from Socitm Advisory have provided an interim IT scoping report which considers the options for the GTI and other ICT requirements related to delivering LBTH's building safety regime. Theo Langlais, IT Project Manager will take the IT scoping/delivery project forward alongside the Building Safety Lead. Further scoping of the technology requirements will be progressed. David Drury 'Business Analyst' has been assisting with scoping for the ICT project to ensure relevant stakeholders are

Risk Ref	Risks	Triggers	Consequences	Existing Control Measures	Current Risk			Required Control Measures			Target Risk			Responsibility	CPT		
					L	I	Total	L	I	Total	L	I	Total				
									involved. An ICT solution 'www.activeplan.co.uk' has been secured by THH on a year's contract to allow more time us to investigate a more bespoke system . j. Seek Cabinet approval. In Progress: A Shadow Building Safety Framework report was approved by Cabinet on 27/11/21. Approval included progressing appointing to the Building Safety Lead role, appointing THH as interim Building Safety Manager (amendments made to the Bill in April 2022 removed the Building Safety Manager role with all duties now sitting under the Accountable Person) and make necessary changes to the constitution where necessary. As the Bill received royal assent on 28 April 2022 there will be consideration into whether the Council's (including THH's) building safety framework for residential buildings needs revising. This is pending the publication of secondary legislation and an understanding of the full requirements of the Act. Cabinet approval will be sought for any changes to the framework around the time of full implementation of the Act (prior to October 2023). k. Review THH's Preparedness for their building safety responsibilities (previously classed as the Building Safety Manager)								

Risk Ref	Risks	Triggers	Consequences	Existing Control Measures	Current Risk			Target Risk			Responsibility	CPT
					L	I	Total	L	I	Total		

Adam Evans
Required Control Measure
Target Date:
31/01/2023
Service reviews [existing suppliers]
o Review approach by segment
Addition of agenda item on cyber security, DR plan, to service review
For vendors where we don't have regular service reviews – send a questionnaire – Mary to add questions DHLU (department for levelling up)
Cyber essentials plus (we ask for this over cyber essentials) – certification vendor should produce based on independent assessment.
Incident management – how and when will they tell us
BCP/DR protocols
Adam Evans
Required Control Measure
Target Date: