

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> <p>Bi-monthly and bi-annual plans in place.</p> <p>Performance monitoring and audit by statutory Local Safeguarding Partnership</p> <p>Performance monitoring and audit by statutory Local Safeguarding Partnership</p> <p>Principal Social Worker leads on implementing learning from other</p>	5	5	25	4	4	16	Steve Reddy	People Are Aspirational, Independent And Have Equal Access To Opportunities.

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				<p>authorities where provision is inadequate.</p> <p>Principal Social Worker leads on implementing learning from other authorities where provision is inadequate.</p>				<p>Annual Converstaion with Ofsted indicated our next inspection will be the full ILACS, expected later in 2023.</p> <p>Steve Reddy</p> <p><u>Required Control Measure</u></p> <p>Target Date: 30/06/2024</p> <p>Tower Hamlets Safeguarding Children's Partnership and increased quality assurance.</p> <p>The THSCP is delivering for 23/24 an increased level of quality assurance, including multi-agency case audits and Safeguarding Child Practice Reviews.</p> <p>On track</p> <p>Steve Reddy</p> <p><u>Required Control Measure</u></p> <p>Target Date: 30/06/2024</p>					
CLSCCB0012	Major Health and Safety Incident affecting Council employees, Buildings or related Infrastructure.	The job: including areas such as the nature of the task, workload, the working environment, the design of displays and controls, and the role of procedures. Tasks not designed in accordance with ergonomic principles to take account of both human limitations and strengths. Not matching the job to the physical and the mental strengths and limitations of people. Mental aspects would include perceptual, attentional, and decision-making requirements.	Injury/ill health/death, direct and indirect costs, disruption to service, reputational damage and possible prosecution	<p>Existing Control Measures</p> <p>Arrangements and performance monitored, audited, and reviewed via Joint Health and Safety Committee</p> <p>6 x corporate specialist Health and Safety Advisors, with 1 allocated to each directorate</p> <p>Corporate H&S training via the Learning Hub and advertised locally</p> <p>Provision of communication around changes in legislation, standards, and industry best practice to schools and services.</p> <p>Updated guidance, templates, and resources available from the H&S section of The Bridge</p>	4	5	20	<p>Required Control Measures</p> <p>Reversing vehicles in Waste have aids and electronic sensors to aid drivers. For Some crews, the disconnection of reversing sensor & automatic breaking systems on RCVs is common practice. H&S Advisors along with Fleet Manager saw evidence of this during an inspection of vehicles – on the one vehicle we checked, the plug for the above mentioned system had been removed completely. Crews have been reminded that these systems are provided with the express purpose of preventing collisions when reversing, especially with pedestrians.</p> <p>Further work required to</p>	3	5	15	Stephen Halsey	Risk Corporate Plans

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		<p>The individual: including a person's competence, skills, personality, attitude, and risk perception. Individual characteristics influence behaviour in complex ways. Some characteristics such as personality are fixed; others such as skills and attitudes may be changed or enhanced.</p> <p>The organisation: including work patterns, the culture of the workplace, resources, communications, leadership and so on. Such factors are often overlooked during the design of jobs but have a significant influence on individual and group behaviour.</p>		Investigation of accident notifications received via the online AIR Form system, in accordance with the CHSS policies and Accident Investigation procedure, with RIDDOR Accident notifications being made on behalf of schools and services				<p>communicate risks, monitor sensors and speak to waste crews Edward Farrelly <u>Required Control Measure</u> Target Date: 30/09/2024 Required Control Measures</p> <p>Process required to mitigate staff from harm through residents who may be potentially violent – 'CoC' process is currently passing through DLTs/CLT Edward Farrelly <u>Required Control Measure</u> Target Date: 31/05/2024 Required Control Measures</p> <p>LBTH Contract Management – Guidance and Toolkit does not contain guidance around management of Health and Safety for contractors, so corporate process may be required Edward Farrelly <u>Required Control Measure</u> Target Date: 31/05/2024 Required Control Measures</p> <p>'Driving for work' guidance for grey fleet lacks same detail and controls that is involved in driving LBTH fleet vehicles – process required Edward Farrelly <u>Required Control Measure</u> Target Date: 31/05/2024</p>				

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RS0056	<p>There is risk to Council's Financial Standing from overspending its revenue budget, failing to deliver savings and a reliance on reserves.</p> <p>(Reserves remain robust but there is a risk that the Medium Term Financial Strategy may require a draw down of reserves. Reserves can only be used once and therefore should not be used to plug permanent budget requirements).</p>	<p>Loss of income in particular council tax, business rates and leisure events.</p> <p>Poor budget management</p> <p>Failure to deliver savings</p> <p>Demographic pressures in Adult Social Care, SEND related pressures in Children's and Unfunded discretionary expenditure from temporary reserves.</p>	<p>Significant financial losses, overspent budgets, drawn down on reserves.</p>	<p>Financial Measures: CLT and SLT have prepared new savings proposals of c£34m for the current financial year, with a further circa c£10m to be identified over the remaining MTFS period</p> <p>Financial Actions: 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 Director of Finance, Procurement and Audit. Redoubled efforts to deliver previously agreed savings proposals.</p>	5	4	20	4	3	12	Chris Leslie	Risk Corporate Plans
HRP0009	<p>There is a risk that historical errors in Pension Scheme member data will lead to materially incorrect calculation of the Pension's liability figure and qualification of the Council's Statement of Accounts and Pension Fund Accounts.</p>	<p>External Audit review of IAS 19 (Employee Benefit) reports leading to discovery of unremediated errors in the underlying records.</p> <p>Triennial valuation to scheme actuary</p> <p>Valuation extracts to scheme actuary</p>	<p>Material error in calculation of the Pension's Liability figure leading to qualification of the Council's Statement of Accounts.</p>	<p>Existing Controls: Detailed to be completed by the Interim Head of Pensions and Treasury.</p>	4	4	16	3	3	9	Abdulrazak Kassim	

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ORG0027	There is an ongoing risk of a Cyber Attack and a consequential Data Breach, Financial Loss and Business Interruption.	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 clicking on phishing scam email links, and/or divulging sensitive information	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	<p>Current activity</p> <p>Internal internal and external reviews.</p> <p>Internal vulnerability scanning is on-going, occurring every week and the critical / high vulnerabilities discovered continue to be escalated for urgent remediation.</p> <p>Annual independent penetration tests.</p> <p>Implementation of a SIEM solution</p> <p>Recruiting additional specialist resources to support the SIEM.</p> <p>Take a risk-based approach to data security.</p> <p>Embed the risk assessment culture within service delivery.</p> <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</p>	4	4	16	4	3	12	Hemanth Shanthigrama	

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				<p>Plan and beyond to maintain effectiveness of BCP plans. 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> <p>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.</p> <p>12/01/23 - independent assessment due Q4 FY22/23 which will evidence be used to evidence the CM</p> <p>The Incident response policies and procedures have been reviewed by external SMEs and recommendations are being drafted for SIRO sign-off by September Security Monthly Operations Meeting (MOM). 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>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>TOR's in draft will be signed of by newly formed SIGB by the end of June.</p> <p>Usman Zia</p> <p><u>Required Control Measure</u></p> <p>Target Date: 30/09/2024</p> <p>Promote Cyber Security awareness using Training and Campaigns</p> <p>- 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</p> <p>- in 2023 the council cyber security campaign culminating in National Cybersecurity Awareness Month in October</p> <p>Mary Umoh</p> <p><u>Required Control Measure</u></p> <p>Target Date: 30/06/2024</p>				

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RSB0023	There is a risk that the Statement of Accounts will receive a qualified opinion for 2020-21 and onwards	External audit of the statement of accounts and the subsequent findings/outcome.	Qualified opinion on statement of accounts. Reputational damage to the Council.	Existing Controls: Details to be completed by the Chief Accountant.	4	4	16	Improvement Plan An extensive improvement plan was enacted and remaining tasks part of BAU from June 2022. The 18/19 and 19/20 accounts have been signed off by the councils external auditors (Deloitte's). The council has focused its resources on publishing draft accounts for financial years 21/22 and 22/23 and completed the period of public inspection for these accounts – which it has done so with the focus now turning to prepare draft accounts for 23/24. DLUHC have recently consulted on a backstop date of 30th September to clear all outstanding draft accounts up to and including 22/23. The auditors work will now largely focus on VFM for the years outstanding (20/21, 21/22 and 22/23) prior to an audit opinion being issued for these years by the backstop date of 30th September (if the consultation proposal is enacted). Ahsan Khan <u>Required Control Measure</u> <u>Target Date:</u> <u>30/06/2024</u>	2	2	4	Abdulrazak Kassim	A Dynamic Outcomes-Based Council Using Digital Innovation And Partnership Working To		
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	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.	Oversight through management reporting Social workers have 1:1 supervision monthly on their casework includes safeguarding cases. Safeguarding case work is managed via s.42 Safeguarding Procedures in line with the Care Act 2014 High risk cases are present to the High-Risk panel The Senior Management Team	3	5	15	Information campaigns to raise awareness of safeguarding with oversight from Safeguarding Adult's Board This is an ongoing priority for the Safeguarding Adults Board and includes the annual 'Safeguarding Month' campaign in November each year. The Independent Chair takes a key role in this and all SAB partners participate. Specific campaigns are run at	2	5	10	Denise Radley	People Are Aspirational, Independent And Have Equal Access To Opportunities.		

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		<p>oversight.</p> <p>Failure of quality control systems.</p> <p>Service user fails to work to agreed partnership / agency arrangements.</p> <p>Poor communication and partnership work.</p> <p>Poor resourcing of service areas against increased demand.</p> <p>Local authority contracted out service do not have sufficiently robust safeguarding arrangements.</p>		<p>managers are responsible for the review and monitor Adult Safeguarding cases in their services in supervision with their Team Managers.</p> <p>The Principal Social Worker leads on implementing learning from Safeguarding Adult Reviews in the Council alongside the Safeguarding Adults Board</p> <p>Hoarding Panel.</p> <p>Evictions Panel - MH Cases - supported accommodation in borough.</p> <p>Safety Huddles / MDTs with GP's Interface documents - pending.</p> <p>Waiting List - RAG rated</p> <p>Safeguarding Adults Board Strategy</p> <p>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 Adults with Learning Disability, Homelessness and Substance Misuse and Self Neglect.</p> <p>Safeguarding issues as part of contract management procedures</p> <p>Procedures overseen by Joint Director for Integrated Commissioning - contract management procedures continue to focus on safeguarding.</p> <p>Care Quality Commission embargo list used.</p> <p>This list is available from the Care Quality Commission highlighting all providers where the CQC has</p>				<p>other times including financial abuse & scams, modern slavery, domestic abuse etc.</p> <p>Katie O'Driscoll</p> <p><u>Required Control Measure</u></p> <p><u>Target Date:</u> 07/07/2024</p> <p>Recruit a new Independent Chair of the Safeguarding Adult Board</p> <p>Following the death of the previous chair, recruit a new independent chair.</p> <p>Denise Radley</p> <p><u>Required Control Measure</u></p> <p><u>Target Date:</u> 30/04/2024</p>				

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				<p>raised concerns.</p> <p>London ADASS branch circulate any service suspensions or restarts due to safeguarding concerns and these are passed to the Brokerage service.</p> <p>Provider Concerns and interface with Adult Safeguarding is a standard agenda item at Joint Adult Social Care and Integrated Commissioning Senior Management Team meeting.</p> <p>Failed visit policy and procedures in place.</p> <p>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.</p> <p>Safeguarding Adult Reviews Action Plan - implementation of recommendations of all SARs</p> <p>We have a Safeguarding Adults Review Tracker in place to monitor and oversee the implementation of actions arising out of Safeguarding Adult Reviews.</p> <p>This is monitored for the Safeguarding Adult Review sub group and Board.</p>								
PLC0013	<p>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.</p>	<p>Accountability for fire safety is not correctly designated, communicated and understood</p> <p>Fire Risk Assessments: * are incomplete, inadequate or not carried out in accordance with the latest advice from DCLG and fire and rescue services</p>	<p>Loss of life</p> <p>Loss of housing stock</p> <p>Lobbying and/or protesting</p> <p>The council and local housing management organisations lose the trust of residents</p> <p>Individual prosecution under a number of Acts of Parliament and common law offences</p>	<p>Work with MHCLG to ensure owners of private residential tower blocks are taking measures to ensure their residents safety</p> <p>1. Officers within the Council, representing Environmental Health, Planning, and Building Control, and Housing and Regeneration meet weekly at the Fire Safety meeting, to discuss progress with the remediation of ACM from tall buildings, this also includes</p>	3	5	15	1	5	5	Karen Swift	A Borough That Our Residents Are Proud Of And Love To Live In.

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		<p>* are not published in accordance with the Mayor's commitment</p> <p>* do not include the time limits on recommendations</p> <p>Fire Risk Assessment Action Plans: are not produced and/or delivered within appropriate timescales</p> <p>Limited current contractor supplier chain for scale of identified fire safety works</p> <p>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</p> <p>Unable to justify block prioritisation policy for programmes of Fire Risk Assessment works</p> <p>Leaseholders do not fit fire rated flat entry doors (ALL flat entrance doors in a block will need to be compliant to achieve good fire compartmentalisation and a 'Tolerable' fire safety standard)</p> <p>Fire safety measures are uncoordinated</p>	<p>with potential penalties including unlimited fines and a maximum of life imprisonment</p> <p>Corporate prosecution with potential penalties of unlimited fines, remedial orders and publicity orders</p> <p>Adverse national media coverage</p> <p>Uninsured financial loss</p> <p>Council perceived as not having fulfilled statutory duty to keep local housing conditions under review</p>	<p>progress on responses to EWS survey. Information from the EWS survey is inputted into the Department for Levelling Up's (DLUHC) DELTA system and details of the information received are sent to a Technical Officer in the Building Control Team for analysis.</p> <p>2. 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.</p> <p>3. This has now progressed to EWS work and applications to the Department for Levelling Up's (DLHUC) BSF fund to remediate materials of concern other than ACM.</p> <p>4. Likewise Officers are in regular dialogue with DLUHC on buildings that are of concern and also to discuss various freeholders and managing agents who are not communicating well or are slow in responding to information requests.</p> <p>5. Monthly meetings are held with DLUHC and Council officers to monitor progress on each building of concern.</p> <p>6. Tower Hamlets Housing Forum, Council Officers, and the London Fire Brigade have a close working partnership on resident consultation.</p> <p>7. New funding from the government for 2022/23 and 23/24</p>				<p>Further control measure will be selected EWS surveys to buildings below 18m where the fire risk assessment has raised concerns about the cladding/ext wall</p> <p>We are carrying out additional fire engineering surveys over the next 2 years. As well as structural safety assessments.</p> <p>Building Safety preparations - our approach being managed through a project which has a project board, manager and produces progress reports. Also, there is a monthly building safety report produced which identifies gaps and progress.</p> <p><i>Karen Swift</i></p> <p><u>Required Control Measure</u></p> <p><i>Target Date:</i> <i>31/05/2024</i></p>				

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				<p>was received to be able to increase inspections and enforcement. This funding is a key mitigation factor for us to continue supporting our residents in tall buildings to feel safe.</p> <p>LBTH Client Management Fire risk assessments for all buildings are up to date and FRA as fire risk assessor UKAS credited.</p> <p>There are 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. 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). Procurement is underway to appoint more permanently a fire engineering consultant to complete fire strategies, means of escape reports and external wall surveys</p>								

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				<p>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>								
ASDASC0018	Regulatory censure and Safeguarding failure arising from deficient process for new and ongoing employee vetting (i.e. pre-employment checks, ongoing vetting of DBS status, verification of qualifications and other suitability/ screening checks).	Non-adherence to procedures in relation to recruitment and employee vetting Failure of reporting mechanisms to provide assurance on vetting Vetting not renewed/updated where required	<ul style="list-style-type: none"> Harm to individual children, young person or vulnerable adult Poor audit/review findings Reputational damage to the council including poor inspection outcomes Poor quality assurance Potential for legal 	Existing protocols and procedures relating to DBS checks and recruitment more generally Existing procedures and guidance on DBS checks and recruitment are available to staff on the Bridge.	3	4	12	1	4	4	Denise Radley	Risk Corporate Plans

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CS0014	<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>	<p>Financial, legal and reputational.</p>	<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: 30/09/2024 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	Usman Zia	<p>A Dynamic Outcomes-Based Council Using Digital Innovation And Partnership Working To</p>		

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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: 30/06/2024</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: 30/06/2024</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: 30/09/2024</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:
31/07/2024
 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.
Usman Zia
Required Control Measure
Target Date:
31/07/2024

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FPA0014	The risk of being unable to reclaim VAT from HMRC owing to weaknesses in accounting for VAT and underlying non-compliance with HMRC requirements	Not being able to provide evidence to substantiate VAT claims	Loss of funds to the Council	<p>Existing Controls: Claims for retrospective VAT are still outstanding with HMRC. However, progress is continuous and Council staff continue to liaise with officers of HMRC on a regular basis. At the time of writing there are no outstanding queries from HMRC so we are waiting simply waiting for claims to be repaid.</p> <p>The Council has engaged PSTax (external tax advisors to carry out an independent review of the councils VAT returns commencing January 2024). The VAT Claims for January and February 2024 have both been reviewed with no significant errors being found.</p> <p>The council has also commissioned an external review of its VAT policies and procedures and the council is in the process of reviewing and implementing recommendations.</p>	3	4	12	2	3	6	Abdulrazak Kassim	
ORG0026	There is a risk the Council will be unable to deliver critical and essential services owing to a Business Continuity Incident.	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	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 & 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 Raj Mistry. The CCB meeting quarterly and more frequently when required.	3	4	12	3	4	12	Stephen Halsey	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		
		due to Cyber Attack, Office Equipment, Mobile Devices or Vehicles Providers – Example – Failure of Commissioned Providers & Suppliers										

- Attending relevant BC and ClearView training.
Where failures in BC processes 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
Simon Smith

Required Control Measure
Target Date:
30/06/2024

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.
Simon Smith

Required Control Measure
Target Date:
30/06/2024

Annual Audit of Business

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		
									Continuity Plans Due to changes in Audit processes the next audit will take place in 2024. There is sufficient governance and scrutiny across the agenda to ensure that risks are managed. The DMT and CMT have recently been provided with the annual CC and BR report and recommendations made. Those recommendations are being followed up. Simon Smith <u>Required Control Measure</u> Target Date: 30/06/2024						
PLC0023	Enforcement Action/Regulatory Censure owing to non-compliance with the Building Safety Act	Lack of leadership Insufficient resources Poor understanding of the requirements and consequences Passage of the bill is faster than anticipated	Potential Injury or death of residents, firefighters and others in the vicinity of the property. Criminal and/or civil litigation for the Council and/or individual senior leadership Delays in construction Regulatory breaches Financial penalties Poor building safety Reputational damage	Research, Legal Advice and Monitoring Key officers are involved in researching the implications of the Bill [Act] Legal advice has been sought LBTH/THH Building Safety Bill [Act] Group monthly meetings to monitor impact and progress and sub-groups to consider impacts and develop new processes. Liaise with London wide forums and Federation of ALMOS on implementation Obtain Human Resources advice when required.	3	4	12	Key actions a. Develop appropriate Resident Engagement Strategies and inform tenants and leaseholders about the Building Safety Act 2022 - IN PROGRESS / TRANSFER OF RISK TO HOUSING MANAGEMENT The council website now has a dedicated Building Safety Act 2022 webpage to keep residents informed of the impact of the Act: https://www.towerhamlets.gov.uk/ignl/business/health_and_safety/fire_safety/Building-Safety-Act.aspx THH have communicated with leaseholders in the September 2022 leaseholder newsletter. A Letter to landlords and building owners in the borough has been prepared and sent to all building owners with buildings above 18m to try and ensure that they are aware of their responsibilities.	2	3	6	Paul Patterson	A Borough That Our Residents Are Proud Of And Love To Live In.		

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		

The resident engagement strategy needs to be produced before April 2024. Feb 24 - a resident consultation is being carried out regarding the strategy..

This action should be taken forward via Housing Management (Housing Asset Management and Housing Neighbourhoods) and should be noted on their JCAD risk.

b. Communicate the likely impact of the Building Safety Bill [Act] to Members, CLT and DLT - COMPLETE

Presentations have been made to CLT, DLT and discussion with members have taken place regarding the Act. Conversations continued as the Act passed through Parliament and became legislation, with updates being shared with the relevant people/groups. New cabinet 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 took place, outlining the changes from the draft Bill to the final Bill that was published on 5 July 21. The Building Safety Bill received Royal Assent 28 April 22 - the Building Safety Act Working Group

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		
									discussed the impacts and preparedness considering any changes from the Bill.						
									The BSA group assisted with any clarifications the Building Safety Act group had 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 [Act] when enacted - COMPLETE						
									THH and LBTH building safety Bill [Act] 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 from 2022/23 onwards. In addition THH had £350k previously approved for 2021/22. Housing Management will submit any additional growth proposal required for complying with the new building safety regime which will be fully implemented from April 2024.						
									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						

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

David Leslie, commenced with the Council as our Building Safety Lead in May 2022. The Building Safety Lead was responsible for the preparations for the building safety regime. Once the Building Safety Act was fully implemented the Building Safety Lead oversaw relevant department's/THH's (Housing Management's) delivery of aspects of the Council's building safety regime, ensuring the Council is compliant with the Act. The intention was that 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. As David Leslie left the council in February 2024, the role as representative for the Building Safety Regulator has been assigned to the Director of Housing Asset Management, pending Cabinet approval.

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.

g. The Council's Building Safety Bill [Act] guidance will be updated regularly by Counsel - COMPLETE

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		
								<p>Bevan Brittan has provided updated advice since the release of the Building Safety Bill on 5 July 21. Bevan Brittan provided a comparison to the draft bill and questions related to the HSE's Oct 21 Building Safety Bill factsheets was provided .</p> <p>Bevan Brittan provided updated advice post royal assent of the Building Safety Bill on 28 April 22.</p> <p>h. Potentially review existing contracts to ensure they comply with the Bill's [Acts] requirements - COMPLETE</p> <p>LBTH Legal has been asked to carry out the review, which was completed by R Ward, Head of Contracts & Commercial (Legal) who is satisfied that the existing contracts complied with the requirements.</p> <p>i. Investigating digital storage methods to maintain the "Golden Thread of information" (GTI) - COMPLETE</p> <p>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. David Drury 'Business Analyst' has been assisting with scoping for the ICT project to ensure relevant stakeholders are involved and has concluded that the GTI can be obtained from various sources. The Building</p>							

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

Safety Regulator has also clarified that the GTI can be obtained from various sources.

(Housing Management are still considering if a bespoke system is required.)

j. Seek Cabinet approval - PARTIALLY COMPLETE / TRANSFER OF RISK TO HOUSING MANAGEMENT

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.

Since the Bill received royal assent a decision has been made to bring THH in-house. Staff TUPED over to the council on 1 November 2023. The formal Building Safety structure will form part of the council-wide restructure including a potential pending restructure of Housing Management.

This risk is to be transferred to Housing Management.

k. Review THH's Preparedness for their building safety

Risk Ref	Risks	Triggers	Consequences	Existing Control Measures	Current Risk			Target Risk			Responsibility	CPT
					L	I	Total	L	I	Total		
				<p>investigation</p> <p>Contractual measures</p> <p>Contracts which require third parties to advise us in a timely way if they are subject to a cyber security incident</p>				<p>reviews [existing suppliers]</p> <p>Draft a questionnaire for mandatory completion</p> <p>Define plan, timeline, roles and responsibilities to conduct this and share the outcomes/generate actions</p> <p>Adamx Evans</p> <p><u>Required Control Measure</u></p> <p>Target Date: 30/06/2024</p> <p>Service reviews [existing suppliers]</p> <ul style="list-style-type: none"> o Review approach by segment <p>Addition of agenda item on cyber security, DR plan, to service review</p> <p>For vendors where we don't have regular service reviews – send a questionnaire – Mary to add questions DHLU (department for levelling up)</p> <p>Cyber essentials plus (we ask for this over cyber essentials) – certification vendor should produce based on independent assessment.</p> <p>Incident management – how and when will they tell us</p> <p>BCP/DR protocols</p> <p>Adamx Evans</p> <p><u>Required Control Measure</u></p> <p>Target Date: 30/06/2024</p>				