

**AUDIT COMMITTEE
28 JULY 2021**

ITEM NO.

ANNUAL RISK MANAGEMENT REPORT 2020/21

SUMMARY REPORT

Purpose of the Report

1. To update Members on the approach to and outcomes from the Council's Risk Management processes.

Summary

2. Positive progress continues to be made within the Authority regarding the management of key strategic risks and with the work undertaken by Officers to manage operational risk.

Recommendation

3. It is recommended this Risk Management Report be noted.

Reasons

4. The recommendation is supported to provide the Audit Committee with evidence to reflect on the Council's approach to Risk Management.

**Ian Williams
Chief Executive**

Background Papers

- (i) Council's Risk Management Strategy
- (ii) Corporate and Group Risk Registers
- (iii) Half Yearly Risk Management Report to Audit Committee 27 January 2021

S17 Crime and Disorder	This report has no implications for crime and disorder
Health and Well Being	There is no specific health and well-being impact
Carbon Impact and Climate Change	There are no specific recommendations contained within the attached reports concerning Carbon Reduction.
Diversity	There is no specific diversity impact.
Wards Affected	All wards are affected equally
Groups Affected	All groups are affected equally
Budget and Policy Framework	This report does not recommend a change to the Council's budget or policy framework
Key Decision	This is not a key decision
Urgent Decision	For the purpose of the 'call-in' procedure this does not represent an urgent matter
Corporate Plan	There is no specific relevance to the Plan beyond a reflection on the Council's governance arrangements
Efficiency	Insurance premiums reflect the pro-active approach taken to risk management within the Council.
Impact on Looked After Children and Care Leavers	The report does not impact upon Looked After Children or Care Leavers.

MAIN REPORT

Background

5. Risk Management is an essential part of effective and efficient management and planning and it strengthens the ability of the Council to achieve its objectives and enhance the value of services provided. It is also an important element in demonstrating continuous improvement as well as being part of the Council's Local Code of Corporate Governance that reflects the requirements of the CIPFA/SOLACE Framework of Corporate Governance.

Information and Analysis

Strategic Risk Outcomes

6. A key element of the Council's planning process is that the areas of potential risk, which could adversely impact on the ability to meet objectives, are identified together with the officer responsible for managing that risk. These risks are plotted on to a standard likelihood and impact matrix with reference to management controls in place and working. The shaded part of the matrix signifies the area above the 'risk appetite line'. Risks in this region require further specific management i.e. are priorities for improvement that have an appropriate improvement action plan. Risk matrices that reflect the updated Council structure from 1 June 2018, are attached at Appendices A-D and show the current Council Corporate and Departmental risks. *N.B. The risk matrices will be updated to reflect the Revision to the Council's Senior Management Structure agreed by [Council](#) on 28 January 2021 in the Half Yearly Risk Management Report 2021/22.*
7. All risks are continually managed during the year by Corporate and Departmental Management Teams including any emerging risks identified. In addition, Assistant Directors/Heads of Service are required to confirm in their Annual Managers Assurance Statements (MAS) that processes are in place to ensure that controls identified to support the positioning of risks on the risk matrices are in place and working.
8. The information that follows, provided by appropriate departmental staff, details progress made on improvement actions for those risks identified as above the risk appetite line.
 - (a) **Corporate Risks (Appendix A)** – one risk has been identified as above the risk appetite line.

(C18) COVID-19:

1. **Health and safety of the Council workforce**
2. **Health and safety of the public of Darlington**
3. **The impact on the Economy of the Borough and its population**
4. **Financial impacts on the Council of increased costs and reduced income**

- (i) In terms of mitigating this risk the Council has introduced safe working practices; is working with partners to make the public aware of risks and working to ensure compliance within businesses and other sectors in the Borough; will work with Government departments and the Tees Valley

Combined Authority to seek to limit the impacts by utilising interventions to kick start the economy; and will keep its Medium Term Financial Plan (MTFP) under constant review and take appropriate decisions to safeguard the Council's finances. The Council is also running community testing in a number of settings to help identify asymptomatic people and the roll out of the vaccinations programme by the NHS, supported locally by the Council and volunteers, to reduce the health risks particularly of the most vulnerable in the early stages of the roll out.

- (b) **Children and Adult Services (Appendix B)** – three risks have been identified as above the risk appetite line.

(C & A1) Inability to contain placement costs for children looked after.

- (i) A full Transformation and Efficiency programme is being delivered with the key objective of developing sufficient provision within or close to Darlington that meet the needs of looked after children. This includes in-house foster care, residential care and specialist provision for complex needs. Due to the changing complexities and the demand for placements not just locally, but also regionally and nationally, the work will be informed by other localities, and joint working will take place where this can add value.

(C & A8b) Increased demand for Children's services impacts negatively on budget.

- (ii) Work is ongoing within the Transformation Programme to safely reduce the level of risk in children's services. Input to this work has been enhanced with colleagues from Leeds City Council under the DfE sponsored Strengthening Families Programme. The ethos of the work will continue despite the programme formally ceasing over the next six months.

(C & A 14b) Failure to respond appropriately to safeguard vulnerable children, in line with national legislation and safeguarding children, thresholds and procedures.

- (iii) Services are in place to screen contacts and referrals, and to respond should concerns be identified. Pathways for intervention are both internal and multi-agency, and the Council ensures that its own staff understand and apply them robustly. During the Covid-19 restrictions, each child open to children's services has a risk assessment in place to determine level of safeguarding need and appropriate visiting frequency. Children have received face to face contact from Children's teams to ensure appropriate safe living environments and services are put in place to meet their needs.

- (c) **Economic Growth & Neighbourhood Services (Appendix C)** – three risks have been identified as above the risk appetite line.

(EG & NS 13) Risk Reworded - Significant impacts arising from the reduction in available cash/resources to the local economy, Council's GF

and HRA and businesses due to the impacts of increased levels of unemployment and Universal Credit payments.

- (i) The Government has provided additional funding to meet irrecoverable Council Tax losses, a Council Tax hardship scheme, additional Business Rates reliefs and various Business Support Grants during the COVID pandemic. In addition, the Council has increased its bad debt provision.

(EG & NS18) Risk reworded - Budget implications arising from the ability to progress and complete schemes/projects in the event of further COVID-19 lockdowns

- (ii) Within the Construction industry there are a series of emerging issues. There are currently unprecedented rises in material prices with no indication of abating and high demand for trades and resource to deliver projects of all sizes. These issues are across all sectors, both private and public. Projects developed prior to these issues materialising may not have built in contingencies into the budget or programme to absorb this. Therefore, this will require Programmes & Projects to be reviewed on an individual basis for affordability and deliverability as costs and programmes are finalised.

(EG & NS20) New Risk - Inability to cope with significant increase in homelessness cases due to new requirements by MHCLG to accommodate everyone irrespective of status in order to limit spread of COVID-19 and also increased levels of homelessness due to increased relationship breakdowns and financial difficulties.

- (iii) Additional funding has been provided by MHCLG for homeless services. More accommodation and support have been commissioned to cope with increased demand.
- (d) **Resources (Appendix D)** – no risks have been identified as above the risk appetite line.

Operational Risk Outcomes

9. The Insurance Group continues to meet representatives of the Council's insurers to examine insurance claims. The insurers are able to provide the group with an update in relation to trends and operational risks to enable continuous improvement to the health and safety culture within the organisation.
10. The key health and safety focus for the Council has continued to be to ensure effective measures are in place to manage the risks associated with the COVID-19 and protect the health and safety of staff and members of the public.
11. The corporate risk assessment COVID-19 and safe systems of work have been developed with the involvement of Public Health and in consultation with the trade unions and have been subject to regular review. Controls followed the Governments 'working safely' guidance and all these have been communicated to staff directly by managers and are available on the intranet.

12. Regular communications continue to be issued to staff regarding the importance of following the Government guidance and an on-line training module produced 'Getting back to work safely during COVID-19' for all staff to complete, providing further information and guidance on the measures in place to help keep staff safe at work.
13. Monitoring the implementation of the risk assessments and safe systems of work is carried out by managers. Managers have been issued with a specific COVID-19 secure workplace monitoring checklist to assist in effective monitoring of the arrangements.
14. A new Employee Protection Register developed in partnership with Xentrall was launched in November 2020. The system is used to inform employees when there is a potential threat to their safety through coming in contact with specific individual customers/clients and provides advice and assistance on how to minimise these risks. Such face to face situations can be either in the individual's home or in a Council building i.e. Customer Services. A warning indicator is recorded against an individual and/or property. Employees access to the system is permissions based.
15. The Reliance Protect lone working devices continue to be used as part of set of measures to reduce the risk to staff lone working. Although understandably overall usage was down on pre-pandemic numbers, owing to a reduction in face to face contacts and visits, a number of services continued to carryout vital work in the community and used the devices routinely as part of a safe system of work. Upgraded devices were issued in March 21 to 40 teams with approximately 500 staff having access to a device when lone working, the new style devices have received positive feedback on the ease of use and design.
16. The Airsweb Incident Management system was launched four months later than planned in August 2020. The system allows employees to report incidents (accidents, violent incidents, near misses) on their PC, tablet or smart device, the line manager is then automatically notified and can start the investigation process. The move to a web-based reporting system was perfectly timed, as it has enabled the reporting, recording and investigation of incidents without the need to complete and pass on paper forms. Feedback on the use of the system from employees and managers has been positive.
17. In March 2020 a new Street Works Permit Scheme was implemented in Darlington. The Council has worked with the other north east authorities over the last 18 months to develop the scheme. Studies by the Department for Transport have indicated that works durations are generally less in areas where a permit scheme operates compared with a noticing regime therefore reducing disruption to the public and road users.
18. The highway inspection & repair regime was able to operate throughout the first six months of the financial year in spite of the restrictions imposed due to COVID-19. 98.6% of highway safety inspections were carried out on schedule during the period with 98% of urgent defects repaired on time.
19. A new Report It system went live on the Council's website on 1 June 2021. This allows customers to report highway & street lighting faults via a smartphone, tablet or desktop PC. These reports are then sent to the Council's Highway Asset Management system (Symology Insight) which allocates them to the appropriate

team. Highway Inspectors receive these reports on their tablet PC's from where they are able to raise a works order and send a reply to the customer advising on what action is proposed. The website displays "pins" showing where defects have been recorded. Therefore, a customer can see if a defect has already been reported. They can also see what stage that report is at. It should be emphasised that Report It is for non-emergency defects. On visiting the site customers are advised that emergencies should be telephoned through to the Council's Contact Centre.

20. The work in recent years to convert the Street Lighting stock to LED lanterns continues to show benefits. As well as the reduction in carbon emissions and electricity costs there has been a decrease in the number of faults reported.
21. The Council has begun this year's programme of carriageway resurfacing works, including micro asphalt and carriageway recycling schemes. Highways have been given an extra £1.2 million from the Government to be spent on maintenance schemes which has been used in the design of this year's programme of works.
22. During the COVID-19 restrictions our Highway Inspectors have continued to monitor the condition of our roads and footways. During the initial lockdown only urgent works were completed however we are now working as normal while being aware of the social distancing measures which are in place.
23. The proactive tree risk management processes continue to provide positive results enabling the Council to defend the majority of storm and subsidence compensation claims received.
24. Occupational Health (OH) is a specialist branch of medicine that focuses on the physical and mental wellbeing of employees in the workplace and considers an employee's ability and fitness to perform a particular job. It has a key role in assisting to manage risks in the workplace that may have the potential to give rise to work-related ill health. The Council's service operates as an in-house model with a directly employed OH Advisor and an OH Doctor provided via a contract with Durham County Council, both of which are suitably qualified and experienced. Together their aim is to prevent work-related illness and injury by:
 - (a) Encouraging safe working practices and proactive absence management;
 - (b) Health surveillance and vaccination programmes in line with HSE recommendations, relevant to the workplace and specific job roles;
 - (c) Supporting the management of sickness absence and facilitating early return to work;
 - (d) Working with Human Resources, Health and Safety and managers to assist with policies to ensure we are health and safety compliant, including ensuring that reasonable adjustments are considered;
 - (e) Providing specific advice to managers on hazards and risks to health with work functions;
 - (f) Conducting pre-employment health assessments;

- (g) Supporting health promotion and awareness programmes;
 - (h) Providing advice and signposting around non-health related problems; and
 - (i) Challenging fit note advice from a GP to ensure a swift return to work that is suitable and safe for the employee and team.
25. During the COVID-19 pandemic and lockdowns, OH has continued to provide a service to the Council, albeit primarily as a virtual/telephone/paper assessment service. The very few face to face assessments that have been carried out have been risk assessed and safe systems of working, appropriate cleaning and PPE used.
 26. COVID-19 has also impacted upon workforce capacity, including that of key services. This has included cases where staff have been infected by COVID-19, required to self-isolate or are shielding. Vulnerability assessments have been undertaken by OH for those required to shield and those returning to work, this has included both vulnerable and extremely vulnerable individuals and appropriate adjustments have been made. The Council has assisted with the rollout of the COVID-19 vaccination to eligible social care and front-line staff, with an uptake of 95% of eligible staff.
 27. What is not yet known is the impact of 'long COVID' sickness absence, reduced access to NHS appointments, the availability of surgery including the associated requirement to isolate to receive treatment and the cost of those medical cases which are now more prolonged as a result of longer waiting times.
 28. Sickness absence was reported as an improvement for the 2020-2021 year with 1.6 days per employee under target and 65% of employees having zero absence.
 29. We continue to monitor the health of the workforce and offer support at different levels for those impacted by COVID-19 and the changes to their working environment. We have worked with partners such as our counselling and physiotherapy providers to ensure that support is available to employees throughout the pandemic and have reinforced the importance of self-referring if these services are needed.
 30. Mental Health First Aiders and Mental Health Mentors have continued to be an asset to the workplace and the Council has continued to promote their availability via 'Teams' and telephone for confidential chats where employees are offered a listening ear and signposted to further help where applicable.
 31. Wellbeing activities and events will continue to be a key feature of the wellbeing strategy. In 2020/21 we engaged with employees over 40 different events, given restrictions, most sessions have taken place remotely but we have continued to ensure that staff working on the front line have received wellbeing advice too especially from a mental health point of view. We also continued to promote health and wellbeing via various online campaigns including an Advent Calendar, February Self Care Challenge and March Positive Photo Campaign all of which were popular, with a total of 8305 intranet hits.
 32. It is the intention that health promotion and awareness will continue to be a focus for monthly Wellbeing Champion posters. These continue to be popular talking

points for team meetings. Occupational Health briefings also continue to promote and raise awareness of health and we continue to target localised health interventions and topical messages to groups/teams.

33. In the recent Working from Home Survey, 67% of staff agreed or strongly agreed that working from home had a positive impact on their physical and mental health, 85% of employees agreed or strongly agreed that they have been able to strike a better work/life balance. Absence figures for those working from home seem to support this, as they dropped by 3.4 days per FTE compared to 2019-20.
34. An area to watch over the coming year is Musculoskeletal absence from employees working from home. We are starting to record and collate evidence of education and support to employees working from home as there is already a trend in claims starting nationally (none for DBC). We have given a lot of advice over the last year and continue to promote DSE assessments, there is also the furniture allowance and employees have been allowed to take their desks/chairs and accessories home. Managers are also tasked with reminding employees to raise appropriate seating positions and posture whilst working from home.
35. Housing and Building Services has continued to adapt and develop how it operates to ensure the provision of a high level service to Council tenants whilst operating within a COVID safe environment. This includes:
 - (a) Introducing Docu-sign, an electronic signature system to reduce face to face appointments as part of our lettings and sign up process for tenants;
 - (b) 90% of Housing Income staff continue to work from home primarily, attending the office on a rota basis for printing purposes and court paperwork preparation;
 - (c) Recovery action on rent income is moving to the next phase following court hearings and evictions re-commencing in June;
 - (d) An online appointment system to book appointments for public PC's and face to face meetings in the Customer Services Centre is due to be implemented in the next couple of months. This will allow the Council to manage security and resources better, especially with a lot of services still working from home;
 - (e) Security improvements have been made to the digital tenancy platform, Darlington Home Online;
 - (f) A Housing Facebook page has been set up to improve communication with customers, making it easier for the department to reach out and advertise services and for customers to contact us;
 - (g) Website improvements have been made to make it easier for customers to use digital as a default to resolve queries through self-service;
 - (h) Housing Schemes (Extra Care, Good Neighbour and Sheltered) have continued to operate in a COVID secure manner with restrictions on visitors in line with government guidelines; and

- (i) Emergency Homeless presentations are triaged via telephone by the Housing Options Team or the Emergency Duty team in line with COVID restrictions.

Conclusion

- 36. The Council's pro-active approach to risk management continues to produce positive results for the Authority.

Outcome of Consultation

- 37. There has been no formal consultation in the preparation of this report.

RISK MATRIX

CORPORATE RISK REGISTER

LIKELIHOOD	A Very High				
	B High				
	C Significant			18	
	D Low			3, 4, 17	
	E Very Low		1		
	F Almost Impossible				
		IV Negligible	III Marginal	II Critical	I Catastrophic
IMPACT					

CORPORATE RISK REGISTER

Risk No.	Risk	Responsible Person	Movement in Period	Reason for Movement on Matrix	Progress on Action Plan for Risks Above the Appetite Line that have not moved
C1	Implementation of recommendations from the Capital Process Review is needed to improve effective capital project management	Dave Winstanley	None at E/III		
C3	Corporate Premises Risks	Ian Williams	None at D/II		
C4	Business Continuity Plans not in place or tested for key critical services	Dave Winstanley	None at D/II		
C5	Council unable to meet its obligations under the information governance agenda	Elizabeth Davison	Deleted from D/II	The Council has delivered its GDPR Implementation Programme and this risk is no longer significant enough to warrant it remaining on the Corporate Risk Register	
C17	Risk Reworded As a result of Brexit and Covid-19, cost and availability of material is impacting on projects	Ian Williams	None at D/II		

Risk No.	Risk	Responsible Person	Movement in Period	Reason for Movement on Matrix	Progress on Action Plan for Risks Above the Appetite Line that have not moved
C18	COVID-19: 1. Health and safety of the Council workforce 2. Health and safety of the public of Darlington 3. The impact on the Economy of the Borough and its population 4. Financial impacts on the Council of increased costs and reduced income	Ian Williams	None at C/II		See main body of report at paragraph 8 (a) i

RISK MATRIX

CHILDREN AND ADULT SERVICES

LIKELIHOOD	A Very High				
	B High			8b	
	C Significant		9b, 16	1	
	D Low		18	3a, 3b, 5, 9a, 10, 14a, 15	14b
	E Very Low			8a	
	F Almost Impossible				
		IV Negligible	III Marginal	II Critical	I Catastrophic
IMPACT					

CHILDREN AND ADULT SERVICES RISK REGISTER

Risk No.	Risk	Responsible Person	Movement in Period	Reason for Movement on Matrix	Progress on Action Plan for Risks Above the Appetite Line that have not moved
C&A 1	Inability to contain placement costs for children looked after due to lack of sufficient in house placements	Jane Kochanowski	None at C/II		See main body of report at paragraph 8 (b) i
C&A 3a	Inability to recruit and retain sufficient qualified suitably experienced social workers in Children's Services impacts on cost and quality of service	Jane Kochanowski	None at D/II		
C&A 3b	Risk Reworded Inability to recruit and retain sufficient qualified suitably experienced social workers and reablement staff in Adult Services impacts on cost and quality of service	Linda Thirkeld	None at D/II		

Risk No.	Risk	Responsible Person	Movement in Period	Reason for Movement on Matrix	Progress on Action Plan for Risks Above the Appetite Line that have not moved
C&A 5	Failure to identify vulnerable schools and broker appropriate support to address needs	Tony Murphy	None at D/II		
C&A 8a Adult	Increased demand for Adult Services impacts negatively on plans for budget efficiencies	Linda Thirkeld	None at E/II		
C&A 8b	Increased demand for Children's Services impacts negatively on budget	Jane Kochanowski	None at B/II		See main body of report at paragraph 8 (b) ii
C&A 9a	Market (Domiciliary Care Residential Care providers) failure following the Care Act/Living Wage	Christine Shields	None at D/II		
C&A 9b	Market (Domiciliary Care Residential Care providers) for Vulnerable Families with Children (including SEND) experiences provider failure	Christine Shields	None at C/III		

C&A 10	The Deprivation of Liberty Safeguards Threshold changes significantly increases the amount of people deprived of their liberty resulting in potential for increased legal challenge	Linda Thirkeld	None at D/II		
C&A 14a	Failure to respond appropriately to safeguard vulnerable adults, in line with national legislation and safeguarding adults procedures	Linda Thirkeld	None at D/II		
C&A 14b	Failure to respond appropriately to safeguard vulnerable children, in line with national legislation and safeguarding children, thresholds and procedures	Jane Kochanowski	None at D/I		See main body of report at paragraph 8 (b) iii
C&A 15	Working with other local commissioners to ensure their understanding of their responsibilities within the Childhood pathway	Penny Spring	None at D/II		
C&A 16	Risk of unsuccessful mobilisation of new service - Support, Recovery and	Penny Spring	None at C/III		

	Treatment In Darlington through Empowerment (STRIDE)				
C&A 17	Impact of NECA not retaining the Drug & Alcohol Contract on the Stop Smoking Service - Will the provider be able to manage the Stop Smoking staff if the Gate is no longer used by the Service	Penny Spring	Removed from C/III	New provider now in place	
C&A 18	Impact of COVID-19 on team capacity	Penny Spring	None at D/III		
C&A 19	New Director of Public Health transition	Penny Spring	Removed from D/III	Director of Public Health recruited and established in role	

RISK MATRIX

ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES

LIKELIHOOD	A Very High				
	B High				
	C Significant		9	13, 18, 20	
	D Low			1, 7, 8, 12, 17, 19	
	E Very Low				
	F Almost Impossible				
		IV Negligible	III Marginal	II Critical	I Catastrophic
IMPACT					

ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES RISK REGISTER

Risk No.	Risk	Responsible Person	Movement in Period	Reason for Movement on Matrix	Progress on Action Plan for Risks Above the Appetite Line that have not moved
EG & NS 1	Investment in regeneration projects is not delivered	Ian Williams	None at D/II		
EG & NS 7	Financial implications of Maintaining and conserving key capital assets within the borough	Guy Metcalfe/ Anthony Sandys/Dave Winstanley	None at D/II		
EG & NS 8	Ability to adequately address the affordable housing requirement	David Hand	Removed from D/II	Outside the Council's control to a large extent	
EG & NS 9	Delay to new Local Plan	David Hand	None at C/III		
EG & NS 12	Planning Performance at risk of Standards Authority intervention	David Coates	Increased to D/II	High volume of planning applications	
EG & NS 13	Significant impacts arising from the reduction in available cash/resources to the local economy, Council's GF and HRA and businesses due to the impacts of increased levels of unemployment and Universal Credit payments	Anthony Sandys	None at C/II		See main body of report at paragraph 8 (c) i

EG & NS14	Regulatory risks associated with provision of services including Street Scene Environmental Services, Building Services (Gas, Legionella, etc.) and the Lifeline service	Ian Thompson / Anthony Sandys	Deleted from D/II	These risks are managed effectively as part of day to day operations and no longer warrant inclusion on the Risk Register	
EG & NS16	Delay in delivering replacement cremators resulting in failure of existing equipment and therefore closure of the service	Ian Thompson	Deleted from D/II	Included in updated Corporate Risk C17	
EG & NS17	Impact of COVID-19 on customers and audiences on confidence to return to leisure and cultural facilities	Ian Thompson	None at D/II		
EG & NS18	Risk reworded Budget & resource implications arising from the ability to progress and complete schemes/projects in the event of further COVID-19 lockdowns & further construction inflation, material supply and resource demands	Dave Winstanley	Increased to C/II	Increased from D/II as construction sector inflation and demand on resources materialising and showing no signs of abatement or easing	See main body of report at paragraph 8 (c) ii

EG & NS19	Potential impact on public transport networks if commercial services do not recover or continue to receive support from Government and routes are withdrawn	Dave Winstanley	None at D/II		
EG & NS20	Inability to cope with significant increase in homelessness cases due to new requirements by MHCLG to accommodate everyone irrespective of status in order to limit spread of COVID-19 and also increased levels of homelessness due to increased relationship breakdowns and financial difficulties	Anthony Sandys	None at C/II		See main body of report at paragraph 8 (c) iii

RISK MATRIX

RESOURCES

LIKELIHOOD	A Very High				
	B High				
	C Significant		1, 9, 26		
	D Low		2, 5		
	E Very Low				
	F Almost Impossible				
		IV Negligible	III Marginal	II Critical	I Catastrophic
IMPACT					

RESOURCES RISK REGISTER

Risk No.	Risk	Responsible Person	Movement in Period	Reason for Movement on Matrix	Progress on Action Plan for Risks Above the Appetite Line that have not moved
RE1	VAT partial exemption breach due to exempt VAT being close to the 5% limit	Elizabeth Davison	None at C/III		
RE2	Fraud in General	Andrew Barber	None at D/III		
RE3	ICT security arrangements inadequate	Ian Miles	Deleted from D/III	ICT security arrangements are certified to ISO27001	
RE5	Increased sickness absence adversely affects service delivery	Elizabeth Davison	None at D/III		
RE9	Instability within financial markets adversely impacts on finance costs and investments	Elizabeth Davison	None at C/III		
RE26	Joint Venture arrangements impacted by a slowdown in house building	Elizabeth Davison	None at C/III		