

Appendix 1: Corporate Risk Register Red Risks

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
EHSCS0001 Madden, Roisin	<p>The significant and increasing numbers of unaccompanied asylum seeking children (UASC) / 'care leavers looked after' arriving within the borough (above the national average) places substantial additional financial pressures on the Council in order to deliver its statutory obligations.</p> <p>Reviewed by risk owner 16/11/21</p> <p>Reviewed at CMT 26/10/21</p> <p>**The voluntary structure of the scheme means there is always vulnerability. Croydon is responsible for all new children under 16 presenting to Lunar House as a locally based service**.</p> <p>Grant Thornton - 'Report in the Public Interest' recommendation number(s): 6 & 7</p> <p>Risk Raised 19/12/2019</p>	<ul style="list-style-type: none"> As a result of the location of Lunar House in the borough Croydon has over three times the national voluntary ceiling of 0.07% of the child population accommodated as UASC Over 57% of the care leavers cohort were previously UASC Support and care for UASC cannot be absorbed into the existing staffing structure and placement budgets like in other Councils Pressure on placement supply of in-house and independent foster carers, and pressures on school places and LAC health services. Significant impact on the council's ability to discharge its statutory duties to all children and families in Croydon; to provide help and protection to children in need and safe effective services to all children in care and care leavers Legislative action. 	Madden, Roisin	5	5	25	5	4	20

Existing Controls

- Existing Controls -- Working with the Home Office to ensure that Adult Asylum Seekers are not placed in Croydon -
- Agreement that 21 children placed by LBC in other London Boroughs are accepted as children in their care with service provision and financial responsibility transferring to the host borough
- 24 London Boroughs agreed to accept newly-arrived under-16s under an extended Pan London Rota for a 3 month period while negotiations with central government on a long term sustainable solution for LBC continue.
- The Home Office to second the Age Assessment Team and meet the costs of the duty team for 12 months with effect from June 2021, relieving a total of £594,000 of revenue costs in 21/22
- 29 Human Rights Assessments completed since December 2020 to inform the safe removal services to care leavers who have exhausted their immigration appeal rights.
- NTS transferred a small number of children presenting at Lunar House to other LAs
- Virtual immigration interview offered by Home Office to prioritise immigration applications of Croydon UASC to enable access to public funds and employment • Regular updates to GPAC and cabinet on progress against the RIPI actions on UASC
- Challenge raised with the Home Office on placing young people in Croydon assessed on arrival in Kent as adults where a challenge to the age assessment results in a requirement on Croydon to accommodate as children
- Report to cabinet in June 2021 set out the issues and risks based on forensic modelling

Future Controls

- Future Controls • Further liaison with Kent CC and Portsmouth on the preparation of legal advice to suspend statutory duties and cease to accept newly arrived children. (Jan 2022 review)
- Development of advice based upon detailed analysis of the specific issues in Croydon (Jan 2022 review)
- Development of options to inform member decisions on further action to address the risks to the ability to discharge statutory responsibilities to all children and families in need of help and support (Jan 2022 review)

Target Date

16/02/2022

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
PH0001 Flowers,Rachel	<p>The Director of Public Health is unable to fulfil all statutory obligations as required under the 1938 Public Health Act in order to assure leadership that they can deliver the appropriate activities to ensure the safety and well-being of all residents within the borough during the winter pressures period.</p> <p>Reviewed by risk owner 15/11/21</p> <p>Reviewed CMT 26/10/21</p> <p>(Risk generated (23/3/20)</p>	<ul style="list-style-type: none"> • Political scrutiny. • Inability to ensure operational delivery in relation to the Council's ability to respond. • Reputational damage. • Financial loss. • Media interest and scrutiny. 	Flowers,Rachel	5	5	25	5	3	15

Existing Controls

- Director of Public Health influence in respect of non-assurance with Exec Management. -- incorporates liaising with relevant Directors and HoS to ensure clarity around plans in place and receive assurance as to organisational preparedness.
- Excess Death Scenario 'Task & Finish Group' participation. -
- LSP of all Croydon parties regularly briefed. -
- Ongoing collaborative working with Corporate Resilience Team to ensure -regular review and update of Council's Pandemic Plan.
- Part of the PAN LONDON network (DPH's). -

Future Controls

- Achievement of coverage for all age categories under the Covid-19 mass vaccination programme. Including 12-15 age group anticipated completion Jan 2022.
- Surge Testing as and when required. To be reviewed at the end of the winter pressures period March 2022

Target Date

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
RCS0032 Ennis, Richard	<p>Croydon Council companies: Robust governance, financial accounting treatment & risk management procedures/frameworks are not activated to safeguard the interests of the Council and it's taxpayers in respect of all subsidiary organisations where the Council has an interest as raised in External Audit's Management letter/report presented to GPAC 20th October 2021.</p> <p>(Specifically in reference to Croydon Affordable Homes & Croydon Affordable Tenures and Brick x Brick).</p> <p>Grant Thornton - 'Report in the Public Interest' recommendation number(s): 8,12,17,19 & 20.</p> <p>Reviewed by risk owner 16/11/2021</p> <p>Reviewed at CMT 26/10/21</p> <p>(Risk generated (26/02/2021)</p>	<ul style="list-style-type: none"> • Significant financial accounting adjustment • Reputational damage. • Political interest and scrutiny. • Media interest and scrutiny. • Council placed in unstable financial position leading to potential bankruptcy. • Significant fraudulent activity. • Continuing and increasing levels of non-compliance. 	Ennis, Richard	5	5	25	5	2	10

Existing Controls

- Annual business plan of BXB reported to Cabinet. -
- Cabinet decision for managed wind down of BxB reached with build out of some sites -
- Cabinet member responsibility in portfolio. -
- Council taking legal advice in respect of Croydon Affordable Homes and Croydon Affordable Tenures -
- Dedicated shareholder function in place to manage relationship and risks. -
- LBC non-executive directors allocated to serve on all subsidiary Boards. -
- PwC Review of the transparency of reporting of any remedial action taken to address in year overspends. -
- Shareholder boards established specifically for Brick by Brick -and secondly for all other external companies feeding into the working group for council companies to report as part of the renewal plan delivery
- Shareholder Representatives and responsibilities identified following review. -
- Strategic review recommendations agreed to reduce risks and deliver secure financial path forward. -

Future Controls

- Report on governance of external and related companies approved with target date for further work/implementation of the CCSMP structure with Member/Cabinet involvement, meetings scheduled to end of 2022

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
RCS0034 Ennis, Richard	<p>Poor financial control and ineffective application of governance arrangements continues to lead to an unstable financial situation, including contract spend and pressures in our major partnership areas including the NHS.</p> <p>Grant Thornton - 'Report in the Public Interest' recommendation number(s):1-20.</p> <p>Reviewed by risk owner 16/11/21</p> <p>Reviewed at CMT 26/10/21</p> <p>(Risk generated 22/10/2020).</p>	<ul style="list-style-type: none"> Internal Controls rated at 'limited' or 'no assurance' by Head of Internal Audit. Continuing instances of non-compliance with corporate policies and legislative requirements. Political scrutiny and interest at local and national level. Media interest at local and national level. Increasing and uncontrollable financial loss. Legislative action. Staff redundancies. Report in the Public Interests (RIPI) issued by External Auditors. Non delivery of in year savings 	Ennis, Richard	5	5	25	5	3	15

Existing Controls

- CMT co-ordination to identify and instigate savings strategies. -
- Collaborative working with MHCLG Improvement & Assurance Panel. -
- Finance Consultant issued report into improving finance system. -
- Immediate spending controls implemented across the Council. -Recruitment; PCards; Spend control panel.
- Introduced non-essential spend and recruitment controls as if s.114 notice issued. -
- Leader, Cabinet Member for Finance & Resources and the Chair of General Purposes & Audit Committee -attended LGA Training 07/11/2020.
- Monthly reporting to CMT/ Cabinet. -
- Proper management of purchase orders to ensure compliance with corporate policy to eliminate retrospective activity. -
- Rapid review completed to highlight issues. -
- Savings assurance meetings with S151 Officer and CEO implemented -
- Spending Control Panel in place monitoring and approving all expenditure across the Council. -

Future Controls

- Outcome of forensic audit to be considered. 2 Directors of Finance from other boroughs also peer reviewing Dec 2021
- Review of 'My Finance' and 'My Resources' systems: Jan 2022
- Review of scheme of delegation and constitution in conjunction with Monitoring Officer Dec 2021.
- Training programmes to be introduced to improve General Purposes & Audit Committee (GPAC) and Scrutiny Committees. Planned training programme ongoing / continuous through financial year 2021/22.

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
RCS0037 Ennis, Richard	Further deterioration in Internal Control & Governance as a result of capacity, budget and resourcing constraints in the organisation. Reviewed by risk owner 16/11/21 Reviewed at CMT 26/10/21 (Risk generated 26/02/2020).	<ul style="list-style-type: none"> Financial / Reputational and Legal implications arising from bad decision making. Poor data control leading to lack of financial control Inadequate financial governance failure to comply with probity requirements, legislation, local regulations or council policy. S114 Notice. Report in the Public interest. 	Ennis, Richard	5	5	25	5	3	15

Existing Controls

- Commissioning & Procurement Framework being reviewed with LGA Support -
- Committee Award process for contracts. -
- Higher profile of key policies and procedures and easier access to support and guidance. -
- Internal review of the current internal governance structures being conducted by Executive Leadership Team. -(Completion October 2021).
- Robust Internal Audit Programme in place. -
- Spend Control Panel -Medium Term Financial Strategy
Work of Steering Board (Exec Directors and Directors).
Financial Procedures Reviewed
Monthly Budget Monitoring
PMO monitoring of adherence and delivery of Renewal Plan
- Strategy implemented to raise profile of Governance / Internal Audit function to ensure appropriate adherence -at all levels across organisation.

Future Controls

- Finance systems including 'My Resources' and 'My Finance' to be reviewed Jan 2022.
- Review by Section 151 officer of the skills and capability and structure of Finance function Peer review with other councils and LGA
- Review of training offer by L&OD to ensure provision of 'fit for purpose' support to all employees. December 2021.

Target Date

28/01/2022

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
RCS0039 Ennis, Richard	<p>The audit of the 2019/20 and 2020/21 accounts could require two significant adjustments, as highlighted in External Audit's management letter/report to GPAC 20 October 2021, to provide a balance and not be qualified.</p> <p>In relation to the 19/20 and 20/21 accounts further significant work is required in relation to the accounting treatment of Croydon Affordable Homes and Croydon Affordable Tenures with any financial implications for both the General Fund and Housing Revenue Account to be dealt with after this review.</p> <p>In addition the council's bank reconciliations do not balance for 20/21.</p> <p>Reviewed by risk owner 16/11/21</p> <p>Reviewed at CMT 26/10/21</p> <p>(Risk generated 22/02/2021).</p>	<ul style="list-style-type: none"> • Qualified accounts provided in respect of 2019/20. • Loss of control of financial position • Political scrutiny applied at local and national level. • Media interest and scrutiny at local and national level. • Continuing financial loss. • Reputational damage. • Potential investigation of historic financial practices. • Impact on reserves 	Ennis, Richard	5	5	25	5	3	15

Existing Controls

- Regular meetings with Grant Thornton and corporate finance team to monitor progress of audit -
- Specific use of transformation funding in relation to 19/20 and 20/21 audited by Grant Thornton -in consultation with corporate finance team.
- The council has engaged CIPFA to advise in relation to the bank reconciliation processes and systems. -
- The Council is taking advice from PWC on accounting treatment -and Trowers and Hamlins on company legal arrangements in relation to Croydon Affordable Homes and Affordable Tenures

Future Controls

- Additional resources in corporate finance to support increased support and oversight of the accounts. This work to be driven by the Section 151 officer review of the Finance function and the effective use of 'My Resources' and 'My Finance' and peer review

Target Date

28/01/2022

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
RCS0040 Ennis, Richard	<p>In respect of the 2022/23 financial year the additional savings as set out by MHCLG in the Capitalisation Direction Agreement (2021) are not delivered, together with the risk of not meeting the challenges of the spending review/local government grant settlement and council tax and social care precept restrictions, leaving the 22/23 budget unbalanced.</p> <p>**The Council would therefore not be able to 'balance the budget' also leading to the refusal for the further £25m loan as part of the final Capitalisation Direction Agreement.**</p> <p>Reviewed by risk owner 16/11/21</p> <p>Reviewed at CMT 26/10/21</p> <p>Reviewed at DLT 2/6/2021.</p> <p>(Risk generated 22/02/2021).</p>	<ul style="list-style-type: none"> • Do not meet terms and conditions set out by MHCLG in Capitalisation Direction Agreement (2021) / Three Year Delivery Programme. • Inappropriate financial behaviour and practice evidenced. • Political scrutiny applied at local and national level. • Media interest and scrutiny at local and national level. • Impact on reserves • Continuing financial loss and potential S114 notice • Reputational damage. • Potential investigation of historic financial practices. • Not balancing 22/23 budget. 	Ennis, Richard	5	5	25	5	3	15

Existing Controls

- Corporate finance working with services to identify further savings for 2022/23 -via Star Chamber process
- MHCLG Improvement & Assurance Panel. -
- Public consultation activity. -
- Review and revision of budget setting process and meetings being conducted by Section 151 officer. -
- Steering board made up of CMT and Directors to oversee the strategy to achieve the additional savings targets established. -

Future Controls

- Renewal plan to be reviewed January 2022.

Target Date

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
ASC0028 Robson, Simon	<p>National Hospital Discharge funding for 4 weeks is confirmed to 31/3/22. The current position is this funding will stop from 1/4/22. The risk is that staffing will then have to be reduced and impact on patient care and hospital length of stay and flow will be severely impacted.</p> <p>Likelihood increased - Funding is due to end but current local and national negotiations' are ongoing and is high risk. (risk generated 01/03/2021).</p> <p>Reviewed 10/11/21</p>	<ul style="list-style-type: none"> Unable to meet deadlines as per the Care Act Financial impact due to packages of care required above BAU budgets. That delays are experienced in the hospital 	Robson, Simon	5	4	20	5	3	15

Existing Controls

- Options analysis of impact of returning to BAU and the impact this will have on the NHS and residents. -Funding extended until 31 March 2022 to review in January
- Partnership working and financial modelling activated. -

Future Controls

- Re-introduction of continuing healthcare teams. Review Feb 2022
- Review re-ablement and LIFE systems. Review Jan 2022
- Work with LGA on analysis of the long-term impact of Covid on adult social care. Review Jan 2022

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
ASC0031 Robson, Simon	Afghan Relocations and Assistance Policy (ARAP) offering relocation or other assistance to current and former Locally Employed Staff in Afghanistan places unsustainable burden on Croydon Council to finance and manage adult social care in quarantine hotels in the borough Raised as draft risk at ELT 21 September 2021 Reviewed at CMT 26/10/21 Reviewed 1/11/2021 SR	Financial, service and reputational impact. Corporate Group meets to monitor activities, numbers and implications for the Council and its partners. Head of Service two way information exchange with corporate group to be able to understand the service impacts and develop effective response.	Robson, Simon	5	4	20	5	4	20

Existing Controls

- To be confirmed by risk owner -

Future Controls

- To be confirmed by risk owner

Target Date

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
CDS0018 Williams, Neil	Confidentiality, integrity or availability of LBC ICT systems is compromised by either a: <ul style="list-style-type: none"> • cyber-attack; • misconfiguration; • malware; • ransomware outbreak; • other malicious system breach; or • human error / non-compliance with GDPR. Reviewed at CMT 26/10/21 (Risk generated 09/03/2021).	<ul style="list-style-type: none"> • LBC ICT systems become unavailable or unresponsive, resulting in critical business functions being adversely impacted for significant period of time. • LBC would incur costs in containment and recovery. • Breach of confidentiality, integrity and availability of sensitive data (including personal data, sensitive personal data and business critical data). 	Williams, Neil	5	4	20	4	3	12

Existing Controls

- Implemented regular vulnerability scanning, technical compliance checks and remediation. -
- Improve security collaboration & knowledge sharing (including 3rd party suppliers and partners). -Capita provision of critical infrastructure information to review and share security vulnerabilities.
- Better defined security roles & responsibilities, in particular between 3rd party suppliers and internal teams. -Negotiated cyber support & tooling contracts and defining support roles with vendors regarding O365/Azure management. (
- Business continuity plans in place for loss of essential services helps minimise disruption. -
- Continue to improve & test back-up & recovery processes. -
- Enhance system and environment lifecycle & decommissioning processes. -Data centre exit completed, process and decommissioning defined/finalised.
- Enhanced system and environment lifecycle & decommissioning processes -
- Expanded vendor risk assessment and management process. -
- Identity and access management improvements implemented. -
- Improve identity and access management (AD clean up) — ongoing since Mar 2020, expected to complete Dec 2021.
- Migration of key infrastructure from legacy datacentre to cloud. -(completed May 2021).
- New cybersecurity initiative & team operating. -
- On-going review & assessment of toolsets & configuration of current software. -
- Security-by-design approach. -
- User awareness training and communication. -

Future Controls

Target Date

- Council-wide mandatory awareness training and communication. as part of L&OD refresh Spring 2022
- Programme of systematic Penetration testing planned Q4 2021/22
- Project to revise IT business continuity plans and improve & rigorously test back-up & recovery processes – Q4 2021/2.
- Review & reconfigure current “core” software & toolsets (MS Suite) – pending O365 upgrade, target Q4 2021/2.

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CEHR0071 Shoesmith, Dean	Organisational behaviours, culture and practices lead to the Council being unable to operate effectively and therefore not serve the residents of the borough and internally within the council in accordance with their expectations. Grant Thornton - 'Report in the Public Interest' recommendation number(s): 1-20. Reviewed by risk owner 11/11/21 Reviewed at CMT 26/10/21 (Risk generated 28/10/2020).	<ul style="list-style-type: none"> • Increasing and uncontrollable financial loss. • Legislative action due to non-compliance with statutory obligations. • Workforce behaviours critically damage the organisation. • Political scrutiny and interest at local and national level. • Media interest at local and national level. • Staff morale. • Continuing and increasing reputational damage. • Government intervention. Employment tribunals and potential for litigation HR process Recruitment and retention of staff	Shoesmith, Dean	5	4	20	5	3	15

Existing Controls

- A provider has been selected and appointed for the culture change programme -all staff will be re-inducted through to ensure the workforce as a collective is aligned to, and achieves, appropriate standards of behaviour and conduct to serve the Council's residents and customers. The provider will be commencing the design work of the programme with immediate effect and working in close collaboration with the Chief Executive, CMT and HR and OD to ensure clear objectives, milestones and outcomes are established
- Coaching and mentoring informal and formal -
- Corporate behaviours and ways of working are core elements -to job descriptions and new performance management system.
- Dedicated Learning & Organisational Development Team supporting culture change -as a key element to Croydon Renewal Plan with core expectations on compliance and accountability.
- Detailed policies and procedures in place and reviewed by relevant accountable officer / team regularly. -
- Governance Framework in place which is modelled on the CIPFA / SOLACE methodology. -
- Internal Audit Programme developed and delivered each financial year. -
- Ongoing engagement with staff. -
- Refreshed manager and staff behaviours and mandatory core training -including good governance and accountability framework schemes to ensure the Council maintains up to date and relevant adherence to legal requirements and initiatives as they relate to organisational best practice and workforce development and enhancement.
- Risk Management Framework in place. -

Future Controls

Target Date

- Corporate Director Assurance Statements to be provided annually. Q4 2021/22
- Corporate objectives updated to reflect new corporate standards to be launched Q4 2021/22
- Health & Wellbeing will be refreshed and launched winter 2021 with a focus developing manager capability in managing staff with mental health conditions
- Introduction 360 April 2022 for all managers commencing with Head of service and above and incrementally including all managers by April 2023
- Under the Croydon renewal plan the cultural transformation programme is a key area of work that will define new behaviours Standard skills and core competencies and values that will reflect performance management and appraisal and new ways of working. All staff will be re-inducted against these standards.

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CIC0005 Mitchell, Peter	<p>The investment strategy and income generating properties do not deliver the required financial benefits / targets.</p> <p>**Main Risks Croydon Park Hotel (£1.75m), Colonnades (potential £700k), Davis House (£200k), BWH (Arcadis £750k) remainder portfolio (£100k). Issue compounded by the inability of landlords to take swift action through the courts to pursue non-payment remedies**.</p> <p>Reviewed at CMT 26/10/21</p> <p>(Risk generated 30/10/20)</p>	<ul style="list-style-type: none"> Financial loss due to under-performance of assets through non-payment of rents due to failure of tenants, reduced rents or deferrals. Service area funding / continuity of delivery could be impacted as a result of lower revenue income to support. Reputational damage due to failure of high profile assets. Political and media scrutiny. Covid-19 pandemic and Brexit significantly impact on investment properties and the general rental income across the wider portfolio leading to reduced revenue generation. Inability of landlords to take swift action through the courts to pursue non-payment remedies 	Mitchell, Peter	4	5	20	4	5	20

Existing Controls

- Clear and agreed (Scrutiny & Cabinet) strategy in place. -Strategy incorporates CIPFA recommendations.
- Croydon Park Hotel disposal imminent Dec 2021. -
- New ways to utilise properties to secure longer term security being investigated. -
- Revised Corporate Asset Strategy in place to help focus resources in the most appropriate way. -The effectiveness of this strategy is dependent on result of Capitalisation Directive award from MHCLG.
- Spending strategy stopped with immediate effect for any more investment purchases. -
- The Asset investment strategy is included within the Asset Management Plan -ensuring proper governance which will include regular quarterly reporting to effectively monitor any impacts.

Future Controls

- Future controls to be confirmed by risk owner

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CIC0008 Mitchell, Peter	Wholesale gas and energy costs increasing and risk of continual increases placing unsustainable financial burden on the council Reviewed at CMT 26/10/21	Financial impact on the council	Mitchell, Peter	5	4	20	5	4	20

Existing Controls

- Current controls to be confirmed by the risk owner -

Future Controls

- Future controls to be confirmed by risk owner

Target Date

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CIC0010 Mitchell, Peter	Risk of financial loss and reputational damage due to the poor performance of Brick By Brick including the Fairfield Halls refurbishment project Reviewed at CMT 26/10/21 (Risk generated 19/05/2021).	<ul style="list-style-type: none"> • Council is liable for the outstanding debt. • Political and media scrutiny and interest. • Financial loss on sale of BxB assets. • Loss of interest on loan payments 	Mitchell, Peter	5	4	20	4	4	16

Existing Controls

- Revised loan agreement to Brick by Brick (excluding Fairfield Halls) - Loan agreement setting down rights and obligations of parties.
- Separate bank account established for accrued interest on loans provided by Council
- Regular Operational meetings between company & Council and Shareholder board

Future Controls

- Additional Management support to be considered for Brick by Brick during managed wind down of the company. Additional third-party support for the build out of certain sites being engaged.
- Review December 2021

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
ED0001 Davies, Shelley	<p>Increasing population with complex learning needs and parental expectations leads to rising demand and financial pressure on SEN fixed budgets including pressure on High Needs Dedicated Schools Grant (DSG) budget, which can't be funded from General Fund reserves. (The School and Early Years Finance (England) Regulations 2020 established a statutory requirement for any DSG deficit balance to be held within the local authority's overall DSG, meaning authorities cannot fund deficit from general fund without Secretary of State approval).</p> <p>Reviewed by risk owner 10/11/21</p> <p>Reviewed at CMT 26/10/21</p> <p>Risk created 17/9/2019.</p>	<ul style="list-style-type: none"> • Children and families do not receive the advice and support they would expect. • Increased costs due to tribunals and complaints leading to reduced reputation. • Inability to achieve outcomes for children and families in Croydon. • LBC over reliance on 'independent sector'. • Increase in Education, Health & Care (EHC) Plans issued with no additional funding provided. • Specialist placement pressures may result in young people with profound disabilities requiring provision out of borough at additional cost to the Council. 	Davies, Shelley	5	4	20	5	3	15

Existing Controls

- 0-25 SEND Strategy Implementation Plan to deliver change across the system. -
- Addington Valley Academy Free School opened in temporary site for Year 7 (September 2020). -
- Addington Valley Free School open on substantive site for all year groups -
- Continue to use Council Members / MP's to lobby Central Government -for a review of the model that funds higher needs to reflect the actual demand for Croydon.
- Delivery of training for travel providers in supporting PMLD and any other pupils requiring APG treatments — and how to maintain safe Covid 19 Health practices should this be required.
- DSG Recovery Plan (balanced budget 2024/25) approved by Schools forum. -
- Early Identification and Intervention –improved HV assessment, identify needs, work with families early. -Support provided for EY education providers, personalised inclusion funding until the end of EY Foundation Stage.
- Free School opened which will relieve pressure in spend in non-mainstream sector. -
- Further senior management review of existing plans. -
- Graduated response – right support, right time. -Meeting needs locally in local schools at SEN Support level; reduced reliance on alternative education.
- Implement strategies for managing demand for more effective mainstream school placements. -
- Implementation of joint working with other local authorities to reduce placement costs. -South London dynamic purchasing system (SL DPS).
- Improved forecasting and reporting of demand led spend to manage overall budget position. -
- Improved projections for school places. -
- Joint Working – children's needs are being met locally in Croydon (cost avoidance in independent sector), -through co-ordinated and coherent pathways which are achieved through collaborative work with parents and YP; across education, health and care.
- July 2019 -5 yr deficit recovery plan submitted to DfE.
- Modelling of Locality Based Working - & Staged Approach supporting mainstream schools meeting SEN needs.
- Post 16 pathway development providing effective local education, care and health pathways to adulthood, -and EHC Plans are ceased in timely way (currently 40% HNB spend is post 16).
- Post 16 specialist placements provision created at Coulsdon College for pupils in Sept 2019. -
- SEN strategy 2019 - 2022 presented and approved by Cabinet March 2019 -following consultation. Plans to improve impact of service and measure to mitigate against cost.
- South London Partnership SEN Commissioning Programme in place -for commissioning residential and day placements for children and young people with Special Education Needs.
- Utilised the additional funding allocated in the 2019 'Spending Review'. -

Future Controls

- High Needs Funding Review planned Jan 2022

Target Date

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
ED0003 Davies, Shelley	The number of Council maintained schools moving into a financial deficit leading to default and arrears continues to increase. Reviewed by risk owner 10/11/21 Reviewed at CMT 26/10/21 (Risk generated 08/08/2017).	• Financial loss to LBC as the Council holds liability to settle deficit should schools transfer to academy status.	Davies, Shelley	4	5	20	4	5	20

Existing Controls

- 'Schools of concern' are under monthly review. -
- Deficit schools report financial outturn monthly to LBC. -
- Implementation of new strategies following -Independent Financial Review of 'Schools in Deficit' funded from DSG schools block. Visits to 'Schools in Deficit'
- Oversight of any significant deficit reporting as a result of C19 in place. -
- Regular update meetings with the Governing Body's / SLT's of schools with the highest levels of debt. -
- Risk rating system is in place for each of the schools that are either in deficit or 'causing concern'. -
- Schools are met with by senior finance and education officers -to discuss their deficit and their action plan for setting a balanced budget in the future.
- Schools are requested to set a licence deficit plan – -this includes a 3 year budget plan as to how the school will return to a balanced position.
- We have input into the school's 3 year business plan to shape repayment terms and included a formal letter of agreement. -Termly finance meetings for all maintained schools sharing best practice etc.
- Where appropriate the Council is using its statutory powers to investigate installing an Interim Executive Board (IEB). -Powers are limited in terms of financial benefit to the LA but could steer the school towards a form of collaboration with another education body.

Future Controls

- School Resource Management Advisor to target meetings with additional school leadership teams and Chair of Governors to review deficit action plans during the start of Autumn term and provide advice to bring budgets in line. Review December 2021

Target Date

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
EHSC0018 Madden, Roisin	<p>Effective action is not taken to address the underlying causes of social care overspends within Children's Services, specifically in terms of both the demand and the resulting cost pressures.</p> <p>Grant Thornton - 'Report in the Public Interest' recommendation number: 1</p> <p>Reviewed by risk owner 10/11/21</p> <p>Reviewed at CMT 26/10/21</p> <p>(Risk generated 05/10/2020).</p>	<ul style="list-style-type: none"> Continuing financial loss. If spend is not within budget MHCLG have reserved the right to appoint commissioners. Political scrutiny. Reputational damage. Further savings required impacting on the council's ability to discharge statutory duties to all children and families Legislative action. 	Madden, Roisin	5	4	20	5	3	15

Existing Controls

- Future Review programme completed and recommendations being acted on - -- Children's Delivery Plan to set out the actions required to reduce spend towards the London average scrutinized at the Improvement and Assurance Panel.
- Monthly meetings scheduled to check progress against the plan from 23.04.21.
- Implications of the MTFs savings on practice reviewed monthly at the Children's Continuous Improvement Board.
- Individual savings projects reviewed and challenged at DLT against a forward plan

Future Controls

Target Date

- The Corporate Finance, Performance and Risk report will provide an update on improvement actions of the Council including:
 - The Corporate Finance, Performance and Risk report will provide an update on improvement actions across the Council including Children's (Review Dec 2021)
 - DFE commissioned Financial Adviser to provide additional challenge and capacity to improve the accuracy and reliability of financial analyses (Review Dec 2021)

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HO0003 Padfield, David	The Council does not meet its statutory obligations for the delivery of the General Building Works across the HRA estate. Reviewed by risk owner Nov 21 Reviewed at CMT 26/10/21 (Risk generated 30/10/2020).	<ul style="list-style-type: none"> • Unsafe buildings. • Enforcement action against the Council by regulatory bodies. • Political scrutiny and interest at local and national level. • Media interest at local and national level. • Substantial financial loss. • Serious incident / injury. 	Padfield, David	5	4	20	5	4	20

Existing Controls

- ARK external independent investigation completed May 2021 and actively implementing recommendations. - Tenants group considering implementation of White Paper 'Charter for social housing residents'
- Tenants/scrutiny panels established in conjunction with housing function
- Resident's panel established for the Regina Road meeting twice weekly
- Priority to ensure all key safety areas are being covered focusing on the gas, electricity, fire, lifts, legionella and asbestos checks
- Clear KPIs in situ
- Rigorous review of maintenance contract and contract management
- Actively working with Regulator for Social Housing to ensure correct approaches being taken
- Door-to-door checks with residents implemented

Future Controls

- Develop better systems for recording maintenance requests / tenant complaints. Condition survey on seven high priority blocks
- Reviewing all housing contracts including Axis, Mulalley, and Echelon Consultancy
- Detailed improvement plan being developed involving a number of staff in housing department
- Review of resident engagement and improvement board to be established.
- Overarching HRA business plan to be developed and published target date March 2022
- Leader of the Council dialogue with C Exec of Axis to be concluded Q4 2021/22

Target Date
24/12/2021

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HO0004 Padfield, David	<p>Major increase in disrepair cases raised under the disrepair protocol and as a result of The Homes (Fitness for Human Habitation) Act 2018.</p> <p>**Act requires landlords to ensure that homes are fit for human habitation and is the most significant change in the law relating to housing conditions since the Housing Act 2004. The first phase of these provisions came into force in March 2019 and new tenancies granted since then have been subject to the new legislation.**</p> <p>Reviewed by risk owner Nov 2021</p> <p>Reviewed at CMT 26/10/21</p> <p>(Risk generated 13/05/2021).</p>	<p>Currently disrepair claims are brought in accordance with the well-established 'pre-action protocol for disrepair claims'. An increase in repair claims which could be driven by:</p> <ul style="list-style-type: none"> • Increased awareness of the ability to claim and to get compensation driven in part by targeted and aggressive advertising and social media campaigns by law firms and claims companies. • The cut to legal aid, as a result a number of law firms have change tactics to increase their revenue by concentrating resources into disrepair cases and we have seen an increase in solicitors door knocking and reported two firms to the Bar Council. • The Homes (Fitness for Human Habitation) Act 2018 which came into effect April 2019. • Cases where we have not due to other maintenance priorities addressed problems with the external fabric of our buildings. This requires an ongoing programme to address rendering failures, DPC, Cavity insulation and roofing renewal. <p>There has been a significant increase in disrepair cases in the last year and in costs. Claims are predominantly (around 95%) related to damp and mould.</p>	Padfield, David	5	4	20	5	4	20

Existing Controls

- Analysis of the disrepair cases in the last year has -changed the process that has been in place with maintenance contractor to ensure all reports of damp are inspected and that the Council separate the issues of dampness vs those caused by ongoing leaks.
- Disrepair cases are managed by the Disrepair surveyor and supported by the Senior surveyor -and Technical Manager in the Technical Team. Approval to appoint an agency disrepair surveyors has been granted

Future Controls

Target Date

- Resources for disrepair work are being urgently reviewed as part of re-organisation of the service Q4 2021/22
- Review use of de-humidifiers and monitors with Asset Management Team to increase use of emerging damp monitoring technology and industry improvements. Q3 2021/22.

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
MO0004 Jones, John	Failure to implement new governance model for the Council associated with directly elected Mayor in May 2022 Reviewed by risk owner 11/11/21 Risk generated 5/11/21	Legal/statutory, reputational and service disruption for the Council and Borough	Jones, John	5	4	20	5	4	20

Existing Controls

- Governance working group currently set up -

Future Controls

- Regular meetings of the WG are held to ensure that work streams are meeting deadlines and where deadlines are not being met that corrective action is taken. Meetings are scheduled through to May 2022.

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PH0007 Flowers,Rachel	<p>The spread of the C-19 infection and the nature of the interventions implemented to reduce it widen health inequalities and increase demand on all Council services.</p> <p>** e.g. overcrowded/poor housing - less effective self-isolation; those in deprived areas more likely to have underlying conditions; unsecure employment leading to great financial insecurity**.</p> <p>Reviewed by risk owner 15/11/21</p> <p>Reviewed at CMT 26/10/21</p> <p>(Risk generated 24/03/2020).</p>	<ul style="list-style-type: none"> Increasing demand on Council services as this occurs. Increased mortality and morbidity in more vulnerable groups. Adult Social Care pressure. Housing demand. Political and media interest. 	Flowers,Rachel	5	4	20	5	2	10

Existing Controls

- Targeted comm's and engagement to the 'at risk' populations / vaccination uptake work included. -
- Council wide Inequalities programmes including Local Strategic Partnerships (LSP). -
- COVID-19 and flu messaging detailed in the NHS Health Check invitation letter sent to people aged 40-74. -
- Deep dive with data to identify if there are patterns around testing -e.g. people not accessing testing or testing positive e.g. community clustering.
- Director of PH is Regional Lead for London (ASC) and briefing LSP / ELT / GOLD on epidemiology -and control measures.
- Epidemiology data provided by DHSC and LCRC reviewed by PH Team on a daily basis to enhance understanding. -
- Free school meal vouchers. -
- Good engagement across borough with C19 Health Protection Board that provides oversight -to the Outbreak Control Plan.
- Lower level risks discussed on regular basis at SILVER and escalated where necessary. -
- The Outbreak Control Plan operating to ensure that there is coordinated approach to provide -effective delivery across the borough in a coordinated and targeted process.
- Ward level Power BI dashboard analyses data at a local level. -

Future Controls

- Achievement of coverage for all age categories under the mass vaccination programme. Including 12-15 Age Group Anticipated completion Dec 2021.

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PP0009 Handford, Gavin	Corporate financial savings objective is not achieved due to poor programme & project management behaviours. Reviewed at CMT 26/10/21 (Risk generated 01/06/2020).	<ul style="list-style-type: none"> • Non delivery of savings plan. • Council budget deficit remains. • Political scrutiny as to why project failed. • Senior officer resignations. • Loss of staff through inability to maintain payroll commitments, low morale, poor service delivery. • Injury to staff and clients through lack of financial support. • Non-achievement of statutory requirements / duties. • Media interest. 	Handford, Gavin	5	4	20	5	3	15

Existing Controls

- Effective Governance Framework implemented to ensure compliance with PM Framework -and all related corporate policies and procedures.
- Programme initiated to coordinate and deliver related project streams -to ensure effective budget savings identified and strategies implemented to deliver.
- Programme Plan in place to ensure achievement of identified objectives. -

Future Controls

Target Date

- Month by month profile of savings to be developed as part of assurance process with Chief Exec Q3 2021/22
- Review of programme outcomes conducted at each stage boundary to ensure compliance with required objectives. CPMO monitor activities for foreseeable future Q3 2021/22
- Role of the internal audit programme and general purposes & audit committee to be developed to encompass follow-ups on the work programme for the delivery plan Q4 2021/22

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PP0014 Handford, Gavin	Performance data provided via some corporate systems and processes is inaccurate and incomplete. Reviewed at CMT 26/10/21 Reviewed DLT 28/07/2021. Risk generated 01/06/2020.	<ul style="list-style-type: none"> Inaccurate / misleading reporting. Financial loss. Reputational damage. Political and media scrutiny. 	Handford, Gavin	5	4	20	5	3	15

Existing Controls

- Data validation activities to ensure accuracy. -
- Enhanced review of data recording in place to identify appropriate strategies to mitigate. -
- Establishment data corrected within My Resources. -
- Ian O'Donnell engaged to deliver review and report. -
- Managers dashboards are available for key workforce information on MyResources. -
- Monthly finance reporting in place. -
- Performance framework aligned to Croydon renewal activated. -
- PMO activity to coordinated reporting. -
- Review of existing data recording practices / processes to ensure accuracy. -
- Workstream initiated to ensure activities are appropriate. -

Future Controls

- Subject experts to be engaged to workflow current practices and identify control weaknesses Q3 2021/22

Target Date

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PP0017 Handford, Gavin	General increasing demand for council services over the winter of 2021/22 driven by several factors including fuel poverty, the ending of Covid furlough scheme, increasing national insurance contributions and the further impact of universal credit. Reviewed at CMT 26/10/21 Risk raised at ELT 21 September 2021	Service, financial, reputational, legal and people dimensions to the risk	Handford, Gavin	5	4	20	5	4	20

Existing Controls

- Current control measures to be confirmed by risk owner -

Future Controls

- Future control measures to be confirmed by risk owner

Target Date

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
PST0001 Cheesbrough, Heather	<p>The Whitgift Centre is not redeveloped as anticipated.</p> <p>Previous uncertainty in respect of retail behaviours has been exacerbated by Covid 19, which has further affected the likelihood of the risk materialising. The redevelopment was removed from the Unibail development pipeline in Feb 20 and there is no date for the redevelopment. The Croydon Limited Partnership (CLP) partners are both suffering from loss of income and are seeking to raise funding to strengthen their balance sheets. Both partners need to review business model and agree new approach to the Whitgift during a time of uncertainty and restricted finances Major personal changes in both partners give rise to a loss of organisational memory.</p> <p>Reviewed at CMT 26/10/21</p> <p>(Risk generated 18/05/2015).</p>	<ul style="list-style-type: none"> • Major economic and social impact if development does not go ahead. • Political and media scrutiny. 	Cheesbrough, Heather	4	5	20	4	4	16

Existing Controls

- Communication channels between politicians and officers with CLP kept cordial and relationship maintained to optimise influence. -
- Consultation with all interested parties, including major land holders. -Town Centre Advisory Board set up of key stakeholders with the Leader to chair. Inaugural meeting Jan 2022
- LBC to continue to press CLP for a robust Meanwhile and Management Strategy to maintain footfall -with monthly meetings to exchange enquiries/contacts and proposals
- Officers and their consultant team continue to seek to hold CLP to account on their plans and to manage -the CPO process to minimise impact to the Council's reputation and the vitality of the town centre.
- Potential to refuse to give consent to exercise Notice of Entry, on applicable land vested by Council -
- Projects will need to be reprofiled within the Growth Zone to later years. -
- Regular communication with the Whitgift Foundation -
- Regular meetings with CLP to maintain dialogue between partners. -Robust discussion through planning pre-application process.
- Relevant Officers / Politicians meet every six weeks under Clause 11 meetings schedule and criteria. -
- Robust record keeping and retention of professional advisor team who have been involved since the beginning of the project -
- The Council through its statutory powers - Local Planning Authority (LPA), CPO and land assembly, and as a Highway Authority. -
- The ending of the exemption for CLP to pay Business Rates on unoccupied buildings due to the CPO -
- The Indemnity Land Transfer Agreement (ILTA) sets out the responsibilities of the parties, penalties with. -timeframes, which will need to be complied with and will need to be actively managed.

Future Controls

Target Date

- End the arrangements entirely with agreement, but would have to address all outstanding issues, land transfer, compensation and make provision for various outstanding claims. (Completion financial year 2021/22).
- The Council seeks to introduce a new development partner, once the ILTA expires (February 2026).
- The preparation of a new Indemnity Land Transfer Agreement (ILTA) that reflects the changed circumstances. (Completion financial year 2025/26). This would require the agreement of both parties

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
RCS0036 Ennis, Richard	Ineffective management of identified risk leads to organisational failure. Grant Thornton - 'Report in the Public Interest' recommendation number(s):1-20. Reviewed by risk owner 16/11/21 Reviewed at CMT 26/10/21 (Risk generated 23/03/2020).	<ul style="list-style-type: none"> • Inaccurate risk reporting leads to risk materialisation and consequences associated with them. • Service disruption, death or serious injury. • Political and media interest and scrutiny. • Leadership Team (senior officer / Cabinet Member) resignations / potential legislative action taken against individuals. • Continuing and increasing financial loss. • Public unrest / disorder. • Legal action against Council instigated. • s.114 Notice submitted. • Political scrutiny (national level). • Media interest and scrutiny. • Regulator criticism. 	Ennis, Richard	5	4	20	5	4	20

Existing Controls

- Continuous horizon scan review of national and global events / trends. -
- Effective risk recording / reporting mechanism in place allowing for 'high level Risk Register reporting to leadership. -CMT are accountable for successful delivery of the Council's Risk Management Framework.
- Frequency of management oversight of risk register has increased at a senior level in line with demand. -
- Rapidity of escalation to CMT amended to achieve desired outcome. -
- Risk is standing item on regular CMT risk reviews. -
- Robust corporate Risk Management Framework in place. -

Future Controls

Target Date

- Further provision of risk management training to Officers and Members to be implemented as the senior leadership team takes shape. Q4 2021/22

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
VRN0024 Aspinall, Kristian	<p>A rise in domestic abuse in the borough resulting in greater numbers of murders and serious harm.</p> <p>Referrals February 2021: 66 high harm high risk (Multi-Agency Risk Assessment Conference aka MARAC).</p> <p>Risk Reviewed by owner 15/11/2021</p> <p>Reviewed at CMT 26/10/21</p> <p>(Risk generated 25/06/2018).</p>	<ul style="list-style-type: none"> • Death or serious injury to clients and their children / families. • Financial loss due to increase in the pressure on inter-related services as well as DASS. • Legislative action. 	Aspinall, Kristian	4	5	20	5	3	15

Existing Controls

- Feb 2021 - The council sought agreement to a refreshed approach from the partners in the -Community Safety Partnership to the recommendations from Domestic Homicide reviews. This should give new focus from partners to learning the lessons from domestic homicides in the borough.
- Action plans for Safer Croydon Partnership. -
- Action plans for the Council's Domestic Abuse Support Service (DASS). -
- Active management of workloads and pressures on staff. -
- Commissioning of DRIVE service provider. -
- Community Safety Strategy -The new Community Safety Strategy is being agreed at cabinet on the 15th November 2021, and includes specific actions and updates to our approaches on domestic violence and efforts to reduce long term causes of violence.
- Contingency location identified if move is delayed. -
- Crime & Disorder Reduction Strategy. -
- Domestic Homicide Reviews -We have agreed the funding for our domestic Violence Homicide reviews as of WB 11/11/2021, and this will be taking place in the coming months. Any actions resulting of these will be captured in an ongoing partnership action plan, and they will be quality reviewed by the Home Office as per protocol.
- Family Justice Centre -Advocates for domestic abuse sufferers. White Ribbon Borough and petition.
- FJC team working with victims and putting in place new advocacy measures -
- High number of referrals for MARAC (VAWG pan London) -We will be developing a VAWG Strategy
The Police will increase their presence in Town Centres across London
MARAC's will continue to be held weekly to manage the volume
Secured MOPAC funding for 2 additional IDVA's to assist in managing MARAC capacity and support our mental health and children's services.
- MARAC and DAPP processes in place. -Occurring weekly to manage increased referral volume.
- Plans in place for prevention and support -
- Presented to GPAC for full review and scrutiny 26/04/2021. -
- Strategic Assessment -Our strategic assessment was refreshed in March 2021. Although not published externally due to the sensitive nature of its contents, the findings of the SA were used in the development of the Community Safety Strategy outlined in action 1), and it continues to be the basis for evidence led decision making across the Croydon Safer Partnership.
- The Council's domestic violence conducts annual refresh of their own specific strategy and work programme -
- The work of the Family Justice Centre. -
- Working with the Police and other public agencies to increase referrals. -

Future Controls

Target Date

- Council will lead on the development of a new Community Safety Strategy for the Safer Croydon Partnership. Given our high and rising rates of domestic abuse it is likely to be a central area of focus.

(Ongoing during 2021).

- Domestic Homicide Review findings pending following statutory review. Winter 2021/22

- The Council's annual strategic assessment will be published this will provide an evidence base to council practitioners and partners to better understand prevalence and types of domestic abuse across the borough.

Winter 2021/22