

Finance & Resources Directorate Plan 2018-20 (refreshed from Directorate Plan 2017-20)

Directorate:	Finance & Resources		
Responsible Officer:	Executive Director of Finance & Resources	Last Updated:	6 September 2018
Signed off by:	Chief Executive	Date:	9 May 2018

Corporate Plan

The purpose of the Corporate Plan is to provide strong civic leadership for the wellbeing and aspiration of Brighton and Hove
We will be successful if we are judged to have delivered:

- **A good life** – ensuring a city for all ages, inclusive of everyone and protecting the most vulnerable
- **A well run city** – keeping the city safe, clean, moving and connected
- **A vibrant economy** – promoting a world class economy with a local workforce to match
- **A modern council** – providing open civic leadership and effective public services

Delivery of this purpose will be evidenced through achieving the Priorities and Principles.

Corporate Plan Priorities		Corporate Plan Principles	
1	Economy, jobs and homes	6	Public Accountability
2	Children and young people	7	Citizen Focused
3	Health and wellbeing	8	Increasing Equality
4	Community safety & resilience	9	Active Citizenship
5	Environmental sustainability		

Directorate Objectives for April 2018 – March 2020

Mission: As part of the Orbis partnership we will provide excellent corporate services to all staff, and help the council to deliver its strategic priorities and manage its risks.

1	Undertake strategic and planned activities that contribute to and improve outcomes for council staff and residents.
2	Act as an innovative, efficient, effective, and customer-focused service provider.
3	Drive and deliver directorate modernisation programmes via the modernisation board in accordance with corporate policies and procedures.
4	Enable effective governance, control, and assurance for the organisation.
5	Develop the quality and impact of City and Council leadership.

Key Directorate deliverables

Directorate Objective 1: Undertake strategic and planned activities that contribute to and improve City outcomes.							
No	Corporate Plan Link	Action/deliverable	Start date	End date	Accountable Lead Officer	Key Internal /External partners involved	SMART Measure of Success
1.1	8	Continue to mitigate for welfare reforms and universal credit (including the Modernisation Programme - Welfare Reform) Investigate and recommend a design for CTR that address incompatibilities with the universal credit model and a consequent impact on collection. Investigate and recommend a service design that incorporates the Council's long term welfare reform mitigation needs into core budgets.	Apr 17	Mar 20	Head of Revenues & Benefits	JobCentre Plus. DWP. CVS. HASC, FCL.	Financial impact on the council (March 2019). Minimise evictions due to welfare reforms (March 2019). Successful management of impacts of roll out of Universal Credit (as far as is possible). New CTR policy in place (December 2018).
1.2	6	Maximising the financial integrity and sustainability of the organisation to minimise unplanned adverse impacts of financial pressures on organisational capacity, services and citizens through effective 4 year Integrated Service and Financial Planning linked to the MTFs.	Apr 17	Mar 20	Deputy Chief Finance Officer	All council. CCG. CVS.	TBM on target at ELT level and compliance with TBM Framework (e.g. FRPs in place). Savings delivered in F&R – overview of savings position across whole council ('Public' TBMs – July, November 2018, February 2019). Effective advice to members that mitigates financial and other risks (February 2019). Unqualified EY audit and VfM

Directorate Objective 1: Undertake strategic and planned activities that contribute to and improve City outcomes.							
No	Corporate Plan Link	Action/deliverable	Start date	End date	Accountable Lead Officer	Key Internal /External partners involved	SMART Measure of Success
							<p>opinions. (Ernst and Young Annual Results Report including opinion on arrangements to secure economy, efficiency and effectiveness in the use of resources - report published in July 2018 for 2017/18.)</p> <p>Updated Medium Term Financial Strategy (February 2019) including Budget Gap identification.</p>
1.3	6	<p>Ensure financial risks that arise from policy and service developments are managed appropriately and with available resources:</p> <ul style="list-style-type: none"> • Potential for adverse financial impact from Universal Credit, including on the HRA. • Health and social care integration and the implications of the SES STP. • Containing the cost of social care. • Plans for pay reform from 2019. • GDPR and new IT&D systems in social care and housing. • Ongoing schools and education reforms and the funding impact on an already stretched DSG budget – increasing proportion of schools carrying deficits. 	Apr 17	Mar 20	Deputy Chief Finance Officer	<p>All council.</p> <p>CCG</p> <p>Orbis</p> <p>SIB</p> <p>CIB</p> <p>GBEB.</p>	<p>Financial strategy (MTFS) in place (February 2019).</p> <p>Sustainable budgets in place (February 2019).</p> <p>Partnerships and sourcing strategies in place – with CCG (Autumn 2018).</p> <p>Fully funded 10 Year Capital Strategy in place and maintained including Modernisation Resources.</p> <p>Business Plans updated and maintained for JV and Company.</p>

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No	Corporate Plan Link	Action/deliverable	Start date	End date	Accountable Lead Officer	Key Internal /External partners involved	SMART Measure of Success
		<ul style="list-style-type: none"> Next phase (4) of Workstyles (including significant proposed investment in Brighton Town Hall and Moulescoomb). Next phase of Neighbourhoods agenda (e.g Field Officers). Changes to local taxation and welfare benefits. Housing Joint Venture and Wholly Owned Company. Major development and regeneration projects including the Waterfront, Royal Pavilion Estate, Preston Barracks, King Alfred, Madeira Terrace, and Valley Gardens. 					Updates to Corporate and Strategic Investment Boards.
1.4	6	Provide the basis for the creation of a new 4 year medium Term Financial Strategy from April 2020, by using best available analysis and the outcome of the Fair Funding Review to advise the new Administration (from may 2019) on likely scenarios and financial parameters.	Apr 18	Mar 20	Deputy Chief Finance Officer	All council Orbis CFO MHCLG (formerly DCLG) SE7	Assumptions communicated with lead members (March 2019). Updated assumptions provided Summer 2018 when Fair Funding Review announced. Scenario plans in place to ensure that budget-setting process for 2020/21 is feasible (March 2019).
1.5	3	Identify and mitigate financial issues playing a wider City Leadership role relating to:	Apr 17	Mar 20	Executive Director of Finances &	HASC CCG	Financial impact on the council (February 2019).

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		<ul style="list-style-type: none"> Adult Social Care through developing relationship with Brighton & Hove CCG. Supporting the Neighbourhoods agenda through engagement with Finance Directors for bodies (especially blue light) on the City Management Board. Supporting work towards the Digital City in partnership with the universities. 			Resources	BSUH Police / Fire Universities CMB (B&H Connected) GBEB	HASC Finance & Performance Board objectives clear and delivered, including path to budget integration and joint commissioning (Summer 2018).
1.6	6	Create a Business Strategy to ensure that the existing financial and operating model and options for future models are clear to the new Administration.	Mar 18	Jun 19	Executive Director of Finances & Resources	All council City stakeholders	Iterations of the Business Strategy in place up to May 2019.
1.7	6	Social Care IT System: looking at a replacement for our current Social Care Case Management system Carefirst			Executive Director of Finances & Resources		Placeholder: further measures of success to follow
1.8	6	Establish improved governance around social care in order to contain the costs within council budgets.	Apr 2018	Mar 2020	Executive Director, Finance & Resources	Health & Adult Social Care; Families, Children & Learning; Brighton & Hove CCG.	Financial performance of social care budgets. Consolidated KPIs (TBC).

Directorate Objective 2: Act as an innovative, efficient, effective, and customer-focused service provider.							
No	Corporate Plan Link	Action/deliverable	Start date	End date	Accountable Lead Officer	Key Internal /External partners involved	SMART Measure of Success
2.1	6	Embed the new agency staff contract in order to secure improved and more efficient services, and a reduction in agency spend across the organisation	Apr 17	Mar 20	Head of Human Resources & Organisational Development	ELT DMT's HR and Finance Business Partners.	95% fill rate of assignments (monthly management reports). 10% improved customer satisfaction (based on annual survey March 2019). Reduction in agency spend of 10% (March 2019).
2.2	6	Defined accountability across the directorate to ensure timely and effective budget management including the delivery of spend to save proposals including any income generation targets.	Apr 17	Mar 20	Executive Director of Finances & Resources	DMT ELT	Orbis net expenditure within budget including delivery of savings proposals (March 2019). MOBO (sovereign) budgets and savings delivered on target.
2.3	7	Oversight of excellent customer and client services as per council's Customer Promise	Apr 17	Mar 20	Executive Director of Finances & Resources		Customer feedback and KPI report. Targets being defined through collaboration with Orbis – Orbis 3 Year Business Plan now in place (quarterly monitoring through Joint Committee). Improvement in Customer Satisfaction & Ease of Effort

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							<p>scores across all services.Customer satisfaction and ease of access (survey).</p> <p>Increase in number of compliments and reduction in number of complaints received (monthly monitoring reports).</p>
2.4	6	Develop a customer service single access point, in order to improve customer experience.	Jan 18	Mar 19	Head of Business Operations	Orbis, All council	<p>Single access point in place (March 2020).</p> <p>Increased customer satisfaction (customer feedback and KPI report). Targets being defined through collaboration with Orbis – Orbis 3 Year Business Plan now in place (quarterly monitoring through Joint Committee).</p>
2.5	6	Improve customer experience through introduction of new productivity and mobility capabilities including: the roll-out of mobile and laptop devices in accordance with a new device strategy; deploy Windows 10 and Office 2016; and the development of a data analytics service offer.	Jan 18	Mar 19	Head of Strategy & Engagement	Orbis, All council	Mobile strategy delivered in line with plans as approved by Corporate Modernisation Delivery Board (March 2019).

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2.6	7	Support the successful delivery of the Digital First programme through the co-design and co-delivery of underpinning technologies, platforms and services in IT&D.	Apr 17	Mar 20	Head of Strategy & Engagement	Orbis, All Council Digital First team Digital & Tech Board (chaired by Chief Executive)	IT&D and DF work programmes are published and identify opportunities for earlier collaboration (March 2019). Support/management arrangements for initiatives delivered by the DF programme are in place prior to programme close (March 2019).
2.7	6	The Executive Director to represent the council as a strategic customer of the Orbis partnership to ensure that council officers receive excellent corporate services. (Includes - Modernisation Programme Orbis: Integrate all services into the Orbis Partnership - March 19).	Apr 17	Mar 20	Executive Director, Finance & Resources	Orbis (Surrey and East Sussex County Councils)	Orbis 3 year business plan KPIs (TBC). Orbis Staff Survey – KPIs being identified; Orbis likely follow B&H model. ISFP savings of £6m achieved by 2019/20.

Directorate Objective 3: Drive and deliver the directorate modernisation programme via the modernisation board in accordance with corporate policies and procedures.							
No	Corporate Plan Link	Action/deliverable	Start date	End date	Accountable Lead Officer	Key Internal /External partners involved	SMART Measure of Success
3.1	6	Modernisation Programmes – People Plan and Culture Change/First Care Attendance Management Solution: Deliver the People Plan priorities to ensure the Council is able to recruit and retain the workforce it needs, and to improve the motivation and morale of staff as measured in the Staff Survey	Apr 17	Mar 20	Head of Human Resources & Organisational Development	All council. Trade unions. Staff Forums.	Deliver specified and non-cashable benefits for the project/programme (March 2019). 10 % improvement in staff survey results against ‘I feel valued by my employer’ question (Staff Survey – September 2018). 10% improvement in equality data regarding representation of staff with a protected characteristic (March 2019).
3.2	6	Modernisation Programme IT&D Infrastructure: Deliver scalable and resilient technical architecture which provides: <ul style="list-style-type: none"> • A secure, highly available platform for business applications. • Scalability via the Orbis Datacentre strategy to allow for quick provisioning of future systems in the cloud. • Aligns Brighton & Hove to the other Orbis partners in terms of technology stack (making future collaboration easier). 	Apr 18	Mar 20	Head of Strategy & Engagement	All council. Orbis.	Technical metrics to be identified and reported to the Tech & Digital Board (e.g. reduced downtime, reduced log-on times, faster access to data) to be define in initial phases of the programme (March 2019). A secure technology environment which is compliant with PSN Co-Co regime (June 2018). Data Centre move (Swindon to

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No	Corporate Plan Link	Action/deliverable	Start date	End date	Accountable Lead Officer	Key Internal /External partners involved	SMART Measure of Success
		<ul style="list-style-type: none"> Potential savings through technology and co-location. 					Ornis) (October 2018). Implement Office 365:\ <ul style="list-style-type: none"> Councillors to i-phones (June 2018). Devices for Field Officers (June 2018). Migration to new Citrix (July 2018). New iPaaS integration platform (August 2018). Staff from Blackberries to i-phones (September 2018). Reduction in the infrastructure support and maintenance overhead (March 2019).
3.3	6	Ensure that Establishment Control process is fit for purpose.	Apr 17	Mar 20	Deputy Chief Finance Officer	All council.	Reconciled staffing structure in place. Note dependencies on procurement of replacement for Talentlink.
3.4	6	Ensure that the recommendations relating to the IT & Digital service set out in the internal audit Buildins & Access Control follow-up report are implemented on a timely basis (report dated 26 March 2018).	Apr 18	Mar 20	Head of Strategy & Engagement	Property & Design	Internal Audit follow up of priority #1 recommendation(April 2019).

Directorate Objective 4: Enable effective governance, control, and assurance for the organisation.							
No	Corporate Plan Link	Action/deliverable	Start date	End date	Accountable Lead Officer	Key Internal /External partners involved	SMART Measure of Success
4.1	6	Ensure that the risk mitigations are properly documented and effectively communicated – and where appropriate that improvements are made to the risk management process.	Apr 17	Mar 20	Audit Manager	All council. Audit & Standards Committee.	% of high priority audit recommendations implemented (March 2019). Ensure that internal audit and other independent assurance work relating to strategic risks is mapped, consolidated and provided to ELT and members (March 2019). Better alignment between risk mitigation and risk appetite (March 2019).
4.2	6	Identify, detect and investigate indications of fraud and corruption focusing on those areas that have the most significant impact on the council and the citizens of Brighton and Hove.	Apr 17	Mar 20	Audit Manager	All council – especially Housing, Revenues & Benefits, and Transport. Sussex Police. DWP.	Undertake fraud investigations including; <ul style="list-style-type: none"> • Deliver or support employee investigations (est 10) • Cancelling blue badges (est 25) • Cancelling concessionary travel passes (est 50) • Identifying overpayments arising from procurement fraud/duplicate payments etc (est £50k) • 20 properties returned to stock

Directorate Objective 4: Enable effective governance, control, and assurance for the organisation.							
No	Corporate Plan Link	Action/deliverable	Start date	End date	Accountable Lead Officer	Key Internal /External partners involved	SMART Measure of Success
							<ul style="list-style-type: none"> Review and vet RTB applications. (est. 95) (All March 2019) <p>Review of NFI data matches and take robust action (March 2019).</p>
4.3	6	Deliver annual Internal Audit Plan whilst maintaining sufficient flexibility to focus on new and emerging risks.	Apr 17	Mar 20	Audit Manager	All council. Audit & Standards Committee.	Regular updates on progress to Audit & Standards Committee against % completion target (March, September, December 2017; January 2018).
4.4	6	Lead the assurance process on long-term capital funding management to ensure that the planned investment is financially sustainable.	Apr 17	Mar 20	Deputy Chief Finance Officer	All council. Property & Design (AMP). Investment partners, e.g. Standard Life, Hyde.	<p>Long-term capital programme forecasts and risk scores (September 2018).</p> <p>MI for Corporate Investment Board (September 2018).</p> <p>Fully funded 10 Year Capital Strategy updated and maintained.</p>
4.5	6	Continual improvement of IT&D disaster recovery and business continuity arrangements to more closely align to corporate Business Continuity priorities.	Apr 17	Mar 20	Head of Strategy & Engagement	All council.	<p>Internal Audit assessment (TBC – will be planned by April 2018).</p> <p>External validation and certification (Summer 2019).</p>

Directorate Objective 4: Enable effective governance, control, and assurance for the organisation.							
No	Corporate Plan Link	Action/deliverable	Start date	End date	Accountable Lead Officer	Key Internal /External partners involved	SMART Measure of Success
4.6	6	Modernisation Programme GDPR: Initiate and run a project to co-ordinate activity across BHCC which ensures that the authority is able to demonstrate compliance with GDPR (General Data Protection Regulation) to supervisory authorities.	Jan 18	Mar 20	Executive Director of Finances & Resources (Programme Manager for Finance & Resources for Camms Strategy)	All council. Orbis CIO. Orbis Data Protection Officer (once appointed). Information Commissioner's Office.	GDPR compliance as assessed by ICO (January 2020). Improved Freedom of Information (FOI) performance. ICO benchmark is 85% of responses within 20 working days (March 2019). Improved Subject Access Request (SAR) performance. ICO benchmark is 85% of responses within 40 calendar days (March 2019). Information Strategy in place (March 2020).
4.7	6	Ensure compliance within the directorate/service (word as applicable) with the General Data Protection Regulation and the Data Protection Act 2018.	Apr 18	Mar 20	Executive Director of Finances & Resources	All council	All data breaches reported to Information Security within 24 hours All Internal Audits relating to data protection compliance in the service have judgements of at least 'Reasonable Assurance'. All business or system changes have answered the Data Privacy Impact Assessment triaging questions and completed an assessment if required

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No	Corporate Plan Link	Action/deliverable	Start date	End date	Accountable Lead Officer	Key Internal /External partners involved	SMART Measure of Success
							All privacy notices reviewed and updated by June 2018 Information asset register completed by (determined by directorate) and then reviewed quarterly
4.8	6	Ensure that information governance is fit for purpose and keeps the SIRO safe.	Apr 17	Mar 20	Executive Director, Finance & Resources(Head of Strategy & Engagement for CammsStrategy)	All council. HM Government.	Information Governance Board KPIs and RAG rating on the Information Governance risk (March 2019). Ongoing CoCo compliance (Summer 2018). Clear outstanding audit recommendations 9March 2019). Compliance with requirements of the Independent Inquiry into Child Sexual Abuse (IICSA) (March 2019). Compliance with the General Data Protection Regulation (GDPR) (March 2020). Ensure compliance with Public Service Network Code of Connection (CoCo), NHS

Directorate Objective 4: Enable effective governance, control, and assurance for the organisation.							
No	Corporate Plan Link	Action/deliverable	Start date	End date	Accountable Lead Officer	Key Internal /External partners involved	SMART Measure of Success
							Information Governance Toolkit and PCI DSS compliance for payments handling (March 2019). Maintain proportionate arrangements to meet Freedom of Information (Fol) and Subject Access Request (SAR) requirements (March 2019).
4.9	6	Ensure each service in the directorate has an up to date and relevant Business Continuity Plan (BCP) in place.	Apr 17	Mar 20	Executive Director of Finances & Resources	Corporate BCP team	Good quality BCPs in place for all services, reviewed annually or sooner if there have been service changes (March 2019). Feedback from Resilience Team implemented in updated plans (following simulation exercise in February 2017). (December 2019).
4.10	6	Modernisation Programme – Procurement & Contract Management: Implement improved oversight over contract management across the council.	Apr 17	Mar 20	Head of Procurement & Contract Management	Orbis	Clear and insightful MI that sets out risk and areas for focus to the Procurement Advisory Board (March 2019). Clear terms for support / intervention as required

Directorate Objective 4: Enable effective governance, control, and assurance for the organisation.							
No	Corporate Plan Link	Action/deliverable	Start date	End date	Accountable Lead Officer	Key Internal /External partners involved	SMART Measure of Success
							(Summer 2018). Mentoring / development targeted at key contract managers (March 2019). £500k cashable savings target in 2018/19 (March 2019).
4.11	6	Embed consistency and consolidate and improve governance and control arrangements for high volume transactional and traded services	Jul 17	Mar 20	Head of Business Operations	Orbis	Improved performance on internal audit reviews to substantial assurance level (March 2019). New KPI's to measure service performance and align with Orbis partners – potential for this to happen; yes / no decision by Summer 2018 (March 2019).

Directorate Objective 5: Develop the quality and impact of City and Council leadership							
No	Corporate Plan Link	Action/deliverable	Start date	End date	Accountable Lead Officer	Key Internal /External partners involved	SMART Measure of Success
5.1	8	Through the delivery of the Workforce Equalities Action Plan and via positive action initiatives increase the diversity of the council's workforce to better reflect its economically active community.	Apr 17	Mar 20	Executive Director of Finances & Resources (HR Business Partner for Finance & Resources for CammsStrategy)	Staff Forums Trade unions.	Positively increase representation across protective characteristic groups by a minimum of 1% across each protected group (March 2020) . Action plan from Directorate Equality Group in place and clear progress (feedback from Equalities team) (March 2019).
5.2	8	Identify differences in access or outcomes for service users relating to their legally protected characteristics and create plans to address these.	Apr 17	Mar 20	Executive Director of Finances & Resources	All council. CVS.	Equalities Impact Assessments are identified and delivered to agreed timetable; budget EIAs are completed and actions implemented to agreed timetable; and any other specific equalities targets for the service including those that your Directorate Equalities Group can help identify (March 2019). Compliance with equalities legislation demonstrated (March 2019). Progress in implementing recommendations from EFLG

Directorate Objective 5: Develop the quality and impact of City and Council leadership							
No	Corporate Plan Link	Action/deliverable	Start date	End date	Accountable Lead Officer	Key Internal /External partners involved	SMART Measure of Success
							report (March 2019).
5.3	8	Service managers will actively support the corporate aim of diversifying the workforce, recruiting and retaining staff from all the city's communities.	Apr 17	Mar 20	Executive Director of Finances & Resources (HR Business Partner for Finance & Resources for CammsStrategy)		Actions taken to increase diversity (job fairs, positive actions statements etc), Numbers of people recruited and percentage of those who are BME and disabled at application, interview and appointment stages as monitored by HR, Percentage of managers who recruit who have been trained (March 2019).
5.4	6	Develop the quality and impact of the Directorate's City and Council leadership	Apr 18	Mar 20	Executive Director of Finances & Resources	Orbis	Reduce Directorate sickness rates % Improvement in 2019 staff survey index Measure of success for City-wide: to be determined by each directorate

Budget April 2018 – March 2020				
	Functional Area	Budget 2018/19 £'000	Budget 2019/20 £'000	Savings over 2-year period £'000
1	Finance	5108	5167	178
2	Procurement & Contract Management	-409	-447	68
3	Business Operations	-162	-267	173
4	Revenues & Benefits	4386	3845	406
5	Human Resources & Organisational Development	2574	2491	351
6	IT&D	6235	6286	482
7	Internal Audit	-36	-37	35
	Total	17696	17038	1693

Risk: Finance & Resources risks as at April 2018						
Risk code	Corporate/ Directorate Plan Link	Risk title	Strategic or Directorate	Risk owner	Initial risk score	Revised risk score
FR DR 01	Directorate Objective: 1	Failure to integrate effectively into the Orbis partnership leads to sub-optimal service outcomes and financial losses	Directorate	Executive Director of Finances & Resources	Yellow L2 x I4	Yellow L2 x I4
SR2	Corporate Plan: Outcome: A modern council	Council is not financially sustainable	Strategic	Executive Director of Finances & Resources (Deputy Chief Finance Officer for CammsRisk)	Red L5 x I4	Amber L3 x I4
SR10	Corporate Plan: Outcome: A modern council	Corporate Information Assets are inadequately controlled and vulnerable to cyber attack.	Strategic	Executive Director of Finances & Resources (Head of Strategy & Engagement for CammsRisk)	Red L4 x I4	Amber L3 x I4
SR18	Corporate Plan: Outcome: A modern council	Service outcomes are sub-optimal due to the lack of appropriate tools for officers to perform their roles	Strategic	Executive Director of Finances & Resources	Amber L3 x I4	Amber L2 x I4

Risk: Finance & Resources risks as at April 2018						
Risk code	Corporate/ Directorate Plan Link	Risk title	Strategic or Directorate	Risk owner	Initial risk score	Revised risk score
SR24	Corporate Plan: Outcome: A modern council	The impact of Welfare Reform increases need and demand for services	Strategic	Executive Director of Finances & Resources (Head of Revenues & Benefits / Revenues & Benefits Manager for CammsRisk)	Red L4 x I4	Amber L4 x I3
SR25	Corporate Plan: Outcome: A modern council	The lack of organisational capacity leads to sub-optimal service outcomes, financial losses, and reputational damage	Strategic	Executive Director of Finances & Resources	Amber L3 x I4	Amber L3 x I3
SR29	Corporate Plan: Outcome: A modern council	Ineffective contract management leads to sub-optimal service outcomes, financial losses, and reputational damage	Strategic	Executive Director of Finances & Resources (Head of Procurement for CammsRisk)	Amber L3 x I4	Amber L2 x I4
SR32	Corporate Plan: Outcome: A modern council	Sub-standard health & safety measures lead to personal injury of staff or residents, financial losses and reputational damage	Strategic	Executive Director of Finances & Resources (Head of Health & Safety) for CammsRisk)	Amber L3 x I5	Amber L2 x I5