



### **Audit and Procurement Committee**

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#### **Time and Date**

3.00 pm on Monday, 15th March 2021

#### **Place**

This meeting will be held remotely. The meeting can be viewed live by pasting this link into your browser:

[https://www.youtube.com/watch?v=zm\\_fGD5z5Hk&feature=youtu.be](https://www.youtube.com/watch?v=zm_fGD5z5Hk&feature=youtu.be)

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#### **Public Business**

1. **Apologies**
2. **Declarations of Interest**
3. **Minutes** (Pages 3 - 10)  
To agree the minutes of the meeting held on 25<sup>th</sup> January 2021
4. **Outstanding Issues** (Pages 11 - 18)  
Report of the Director of Law and Governance
5. **Work Programme 2020/21** (Pages 19 - 20)  
Report of the Director of Law and Governance
6. **2020/21 Third Quarter Financial Monitoring Report (to December 2020)**  
(Pages 21 - 46)  
Report of the Director of Finance
7. **Corporate and COVID-19 Risk Registers** (Pages 47 - 122)  
Report of the Director of Finance
8. **Information Governance Annual Report 2019-20** (Pages 123 - 132)  
Report of the Director of Law and Governance
9. **Any other items of public business which the Chair decides to take as a matter of urgency because of the special circumstances involved.**

#### **Private business**

**Nil**

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Julie Newman, Director of Law and Governance, Council House, Coventry  
Friday, 5 March 2021

Note: The person to contact about the agenda and documents for this meeting is Lara Knight / Michelle Salmon, Governance Services, Tel: 024 7697 2642 / 2643, Email: [lara.knight@coventry.gov.uk](mailto:lara.knight@coventry.gov.uk) / [michelle.salmon@coventry.gov.uk](mailto:michelle.salmon@coventry.gov.uk)

Membership of the Committee:

Councillors M Ali, J Blundell, R Lakha (Chair), T Sawdon, B Singh (Deputy Chair) and R Singh

By Invitation:

Councillor R Brown - Cabinet Member for Strategic Finance and Resources

**Lara Knight / Michelle Salmon**

**Governance Services**

**Telephone: 024 7697 2642 / 024 7697 2643**

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**Coventry City Council**  
**Minutes of the Meeting of the Audit and Procurement Committee held at 4.00 pm**  
**on Monday, 25 January 2021**  
**(This meeting was held remotely)**

Present:

Members: Councillor R Lakha (Chair)  
Councillor M Ali  
Councillor T Sawdon  
Councillor B Singh  
Councillor R Singh

Employees (by Service):

Finance P Jennings, A Stretton, K Tyler

Law and Governance M Rose, M Salmon

Apologies: Councillor J Blundell  
Councillor R Brown – Cabinet Member for Strategic Finance  
and Resources (By invitation)

## **Public Business**

### **29. Declarations of Interest**

There were no disclosable pecuniary interests.

### **30. Minutes of Previous Meeting**

The minutes of the meeting held on 30<sup>th</sup> November 2020 were agreed as a true record. There were no matters arising.

### **31. Exclusion of Press and Public**

**RESOLVED** that the Audit and Procurement Committee agrees to exclude the press and public under Section 100(A)(4) of the Local Government Act 1972 relating to the private report in Minute 39 below headed 'Half Yearly Fraud and Error Report 2020-21', on the grounds that the report involves the likely disclosure of information defined in Paragraph 3 of Schedule 12A of the Act, as it contains information relating to the financial and business affairs of a particular person (including the authority holding that information) and that, in all circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

### 32. **Outstanding Issues**

The Audit and Procurement Committee considered a report of the Director of Law and Governance which identified issues on which a further report/information had been requested or was outstanding so that Members were aware of them and could manage their progress.

Appendix 1 to the report provided details of issues where a report back had been requested to a meeting, along with the anticipated date for consideration of the matter. Appendix 2 to the report provided details of items where information had been requested outside formal meetings, along with the date when this had been completed.

**RESOLVED that the Audit and Procurement Committee notes the Outstanding Issues report.**

### 33. **Work Programme 2020/21**

The Audit and Procurement Committee considered a report of the Director of Law and Governance which set out the Work Programme of scheduled issues to be considered by the Committee during the 2020/21 municipal year.

**RESOLVED that the Audit and Procurement Committee notes the Work Programme for 2020/21.**

### 34. **Treasury Management update**

The Audit and Procurement Committee considered a briefing note of the Director of Finance that provided an update on the Council's Treasury Management activity in 2020/21 to the end of September 2020, as required by the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice. The Appendices to the report provided details of the Council's Lending List and the list of short-term borrowing and investments that the Council held.

At the end of the previous financial year, the total short-term borrowing was £20m. A further significant amount of short-term borrowing (£74m) was undertaken in April 2020 solely to enable a heavily discounted upfront payment of £97.8m to be made to the West Midlands Pension Fund. This payment represents three years employer's contributions.

No long-term borrowing had been undertaken for several years, due in part to the level of investment balances available to the Council, and no long-term borrowing was planned. As at 31st March 2020, the Council's long-term liabilities totalled £315.8m with most long-term borrowing was sourced from the Public Works Loan Board (PWLB) (£190.4m). In November 2020 the PWLB cut its lending rates by 1%, however councils could now only borrow from PWLB if there was no intention to buy investment assets primarily for yield, in the three years following a loan. Further the PWLB would not lend to a council planning to buy assets for yield regardless of whether the transaction would notionally be financed from a source

other than the PWLB and failure to comply with the rules could lead to a council being banned from using the PWLB borrowing facility.

The impact to the UK from the Covid 19 pandemic had a major influence on the economy and the Council's ability to gain returns on investments, ongoing into 2021/22. In the overall economy, the medium-term outlook had improved with the administration of the vaccine, however the recent upsurge in coronavirus cases had worsened economic prospects over the short-term. The potential for bank losses was expected to be greater than expected once government and central support was removed, suggesting a cautious approach to bank deposits in the short-term.

The Council had been in receipt of central government funding to support small and medium businesses during the coronavirus pandemic through grant schemes. These funds have been temporarily invested in short-term liquid instruments, particularly in Money Market Funds. Work continued to ensure that all appropriate parties receive grant payments. The government had announced a further support package of grants up to £9,000 per business to be administered by the Council with the upfront payment of grants grossly inflating the Council's cash balances.

**RESOLVED that the Audit and Procurement Committee notes the Treasury Management Update.**

**35. Quarter Three Internal Audit Progress Report 2020-21**

The Audit and Procurement Committee considered a report of the Director of Finance that provided an update on the internal audit activity for the period April to December 2020, against the Internal Audit Plan for 2020-21. An Appendix to the report set out the Summary Findings from Key Audit Reports Completed in this period.

The key target facing the Internal Audit Service was to complete 90% of its work plan by the 31st March 2021. An analysis of progress against planned work for the period April to December 2020 was set out in the report. At the end of December 2020, the Service had completed 53% of the Audit Plan against a planned target of 75%, due to a post vacancy, work on assurance requirements for grants to businesses, priorities around the pandemic requiring flexibility of the Service. Achievement of 90% of the Audit Plan by the end of March 2021 would be a key priority for the Internal Audit Service in quarter four.

In addition to the delivery of the Audit Plan, the Internal Audit Service had a number of other KPI's which underpinned its delivery. A table in the report gave a summary of the performance for 2020-21 to date against five KPIs, with comparative figures for the financial year 2019-20. Currently, all indicators were at or above target. A further table provided a list of audits finalised between April and December 2020, along with the level of assurance provided.

The following Audits were currently in progress:

- Audits at Draft Report Stage – Information Governance Risk Management.
- Audits On-going – Expenditure Analytical Review, Sickness Absence Reporting, Management Compliance with HR Procedures Follow Up, CareDirector, Cyber Resilience, Mobile Phones, Council Tax, Payment of

Allowances, Risk Management, Controls over Additional Covid Funding, Business Grants round 2, Accounts Receivable.

The Chair, Councillor Lakha, placed on record his appreciation and thanks to the Chief Internal Auditor and the Audit Team for their hard work relating to business grants.

**RESOLVED that the Audit and Procurement Committee:**

- 1) Notes the performance as at quarter three against the Internal Audit Plan for 2020-21 and the summary findings of the key audit reviews as set out in the Appendix to the report.**
- 2) Requests that a briefing note providing further detail of planned IT audit work for 2021/22, be submitted to the Committee when the Annual Audit Plan is submitted for consideration.**

**36. Annual Fraud and Error Report 2019-20**

The Audit and Procurement Committee considered a report of the Director of Finance that provided a summary of the Council's anti-fraud and error activity undertaken by the Internal Audit Service for the financial year 2019-20.

The report documented the Council's response to fraud and error during 2019-2020 and was presented to the Committee in order to discharge its responsibility, as reflected in its terms of reference 'to monitor Council policies on whistleblowing and the fraud and corruption strategy'.

The Internal Audit Service was responsible for leading on the Council's response to the risk of fraud and error. The work of the team has focused on four main areas during 2019-20: Council Tax; National Fraud Initiative; Referrals and investigations considered through the Council's Fraud and Corruption Strategy; and Proactive work. A summary of the key activity that had taken place in each of these areas was set out in the report.

Within the International Auditing Standards, there were clear expectations around the level of oversight that the Audit and Procurement Committee should have in relation to the risk of fraud within the Council. This included an expectation that appropriate detail was provided around significant fraud. The following principles were applied when defining significant fraud:

- A financial impact in excess of £10,000.
- Frauds of under £10,000 could be included if the Chief Internal Auditor considered this justified by the nature of the fraud.
- In terms of establishing when a fraud had occurred, this was normally defined as occurring when the disciplinary process had been concluded, although in cases not involving employees, this would be linked to other management action, such as criminal prosecution.

In the period April 2019 to March 2020, no significant frauds had been identified.

During 2019-20, the Council received six whistleblowing disclosures. A summary of the disclosures made by type and the response was set out in a table in the report. Whilst all concerns were taken seriously, the response differed on a case by case basis. In some cases, if the disclosure had been made anonymously and insufficient details had been provided, the Council may be restricted in the action it could take. However, typically a preliminary fact-finding investigation would be undertaken which, if required, would result in a full investigation and formal action being considered.

The Chartered Institute of Public Finance and Accountancy Fraud and Corruption Tracker provided annual benchmarking information relating to counter fraud activity across all local authorities. In the 2019 survey, respondents reported a total of 755 whistleblowing cases. The figures reported indicate that the number of disclosures received by the Council was comparable to the national average of six whistleblowing disclosures per local authority. It was also worth noting that employees did not have to use the Whistleblowing Policy to raise concerns and were able to resolve matters using other routes if they wished, this could be through discussion with their line manager or reporting concerns to one of the “prescribed persons” set out in the Public Interest Disclosure (Prescribed Persons) Order 2014, such as the Health and Safety Executive. In 2019-20, the Council launched a campaign “I have a concern” to promote to employees’ different ways in which they could raise concerns about work, including how to raise an issue through the whistleblowing process.

Members requested information on the last SPD exercise undertaken in conjunction with 3rd party and the Chief Internal Auditor undertook circulate this to Members of the Committee.

**RESOLVED that the Audit and Procurement Committee notes the anti-fraud and error activity undertaken in the financial year 2019-20.**

**37. Half Yearly Fraud and Error Report 2020-21**

The Audit and Procurement Committee considered a report of the Director of Finance that provided a summary of the Council's anti-fraud and error activity undertaken by the Internal Audit Service during the financial year 2020-21 to date.

A corresponding private report was also submitted to the meeting setting out the commercially confidential matters of the proposals. (Minute 39 below refers.)

Fraud in the public sector had a national focus through the publication of “Fighting Fraud and Corruption Locally – The Local Government Counter Fraud and Corruption Strategy”. Whilst the national strategy stated that the level of fraud in the public sector was significant, the current trends in fraud activity included areas which Coventry City Council did not have responsibility for, such as social housing, and the levels of identified / reported fraud against the Council remained at relatively low levels, in both numbers and value. Notwithstanding this, it was recognised that the risk of fraud during emergency situations such as the pandemic was higher than at other times. This included an inherent risk of fraud in emergency programmes which local authorities had to administer on behalf of government, particularly in relation to grants paid to businesses. This risk had

been explicitly acknowledged by government in guidance issued to local authorities and as such, the Internal Audit Service had specifically included this within its anti-fraud work undertaken in 2020-21.

The report documented the Council's response to fraud and error during the first half of the financial year 2020-21 and was presented to the Audit and Procurement Committee in order to discharge its responsibility, as reflected in its terms of reference 'to monitor Council policies on whistle blowing and the fraud and corruption strategy'.

The Internal Audit Service was responsible for leading on the Council's response to the risk of fraud and error with the work of the team focused on three main areas during 2020-21: Business Support Grants; National Fraud Initiative; and Referrals and Investigations considered through the Council's Fraud and Corruption Strategy. A summary of the key activity that had taken place in these areas during 2020-21 to date was set out in the report.

Within International Auditing Standards there were clear expectations around the level of oversight that the Audit and Procurement Committee should have in relation to the risk of fraud within the Council. This included an expectation that appropriate detail was provided around significant fraud. The Council had applied the following principles when defining significant fraud:

- A financial impact in excess of £10,000.
- Frauds of under £10,000 could be included if the Chief Internal Auditor considered this justified by the nature of the fraud.
- In terms of establishing when a fraud had occurred, this was normally defined as occurring when the disciplinary process had been concluded, although in cases not involving employees, this would be linked to other management action, such as criminal prosecution.

In the period April 2020 to September 2020, one significant fraud had been concluded and the corresponding private report provided details of this case and the actions taken.

Whilst the Internal Audit Service normally undertook a rolling programme of reviews of council tax exemptions and discounts, this work had not been progressed during the period April to September 2020, given the focus on business grant work. As a rolling programme of work, this was not viewed as significant. Some work in this area had commenced in the second half of the year.

The Council received referrals from both internal and external sources linked to concerns around the payment of council tax support or council tax discounts / exemptions. A table in the report set out the number of referrals received by source during the first half of the financial year 2020-21. Whilst appropriate cases were passed to the Department of Work and Pensions to investigate under agreed arrangements i.e. where housing benefit was also in payment, the Internal Audit Service have validated two concerns in 2020-21, which had resulted in revised bills / overpayments of around £14k being issued, of which £8K had been recovered to date.



**RESOLVED that the Audit and Procurement Committee notes the anti- fraud and error activity undertaken during the first half of the financial year 2020-21, subject to consideration of the private report on significant fraud.**

38. **Any other items of public business which the Chair decides to take as a matter of urgency because of the special circumstances involved.**

There were no other items of public business.

39. **Half Yearly Fraud and Error Report 2020-21**

Further to Minute 37 above, the Cabinet considered a private report of the Director of Finance setting out confidential matters relating to the HalfYearly Fraud and Error Report 2020-21.

**RESOLVED that the Audit and Procurement Committee notes the details of the report and confirms its satisfaction with the action taken in respect of matters.**

40. **Any other items of private business which the Chair decides to take as a matter of urgency because of the special circumstances involved.**

There were no other items of private business.

(Meeting closed at 5.50 pm)

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Audit and Procurement Committee

15<sup>th</sup> March 2021

**Name of Cabinet Member:**

Cabinet Member for Strategic Finance and Resources – Councillor R Brown

**Director approving submission of the report:**

Director of Law and Governance

**Ward(s) affected:**

N/A

**Title:**

Outstanding Issues

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**Is this a key decision?**

No

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**Executive summary:**

This report is to identify those issues on which further reports / information has been requested or are outstanding so that Members are aware of them and can monitor their progress.

**Recommendations:**

The Committee is recommended to:

1. Consider the list of outstanding items as set out in the Appendices to the report, and to ask the Director concerned to explain the current position on those items which should have been discharged.
2. Agree that those items identified as completed within the Appendices to the report, be confirmed as discharged and removed from the outstanding issues list.

**List of Appendices included:**

Appendix 1 - Further Report Requested to Future Meeting

Appendix 2 - Information Requested Outside Meeting

**Other useful background papers:**

None

**Has it or will it be considered by scrutiny?**

No

**Has it, or will it be considered by any other council committee, advisory panel or other body?**

No

**Will this report go to Council?**

No

**Report title:  
Outstanding Issues**

**1. Context (or background)**

- 1.1 In May 2004, the City Council adopted an Outstanding Minutes system, linked to the Forward Plan, to ensure that follow-up reports can be monitored and reported to Members.
- 1.2 At their meeting on 25<sup>th</sup> January 2017, the Audit and Procurement Committee requested that, in addition to further reports being incorporated into the Committee's Work Programme, a report be submitted to each meeting detailing those additional reports requested to a future meeting along with details of additional information requested outside the formal meeting.
- 1.3 Appendix 1 to the report outlines items where a report back has been requested to a future Committee meeting, along with the anticipated date for further consideration of the issue.
- 1.4 In addition, Appendix 2 to the report sets out items where additional information was requested outside the formal meeting along with the date when this was completed.
- 1.5 Where a request has been made to delay the consideration of the report back, the proposed revised date is identified, along with the reason for the request.

**2. Options considered and recommended proposal**

- 2.1 N/A

**3. Results of consultation undertaken**

- 3.1 N/A

**4. Timetable for implementing this decision**

- 4.1 N/A

**5. Comments from the Director of Finance and the Director of Law and Governance**

- 5.1 Financial implications

N/A

- 5.2 Legal implications

N/A

**6. Other implications**

- 6.1 How will this contribute to achievement of the Council's Plan?

N/A

- 6.2 How is risk being managed?

This report will be considered and monitored at each meeting of the Cabinet

**6.3 What is the impact on the organisation?**

N/A

**6.4 Equalities / EIA**

N/A

**6.5 Implications for (or impact on) climate change and the environment**

N/A

**6.6 Implications for partner organisations?**

N/A

**Report author(s):**

**Name and job title:**

Lara Knight  
Governance Services Co-ordinator

**Service:**

Law and Governance

**Tel and email contact:**

E-mail: Lara.knight@coventry.gov.uk  
Tel: 024 7697 2642

Enquiries should be directed to the above person.

<b>Contributor/approver name</b>	<b>Title</b>	<b>Service</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
<b>Contributors:</b>				
-				
<b>Names of approvers: (Officers and Members)</b>				
-				

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## Appendix 1

### Further Reports Requested to Future Meetings

	<b>Subject</b>	<b>Minute Reference and Date Originally Considered</b>	<b>Date for Further Consideration</b>	<b>Responsible Officer</b>	<b>Proposed Amendment to Date for Consideration</b>	<b>Reason for Request to Delay Submission of Report</b>
1.	Corporate Risk Register Update - Consideration be given to Risk 020 relating to Brexit being rated as red and a report prepared for the Committee in due course.	Minute 54/19 27 January 2020	To be confirmed	Paul Jennings		
2	Further information requested on the progress of recommendations made in respect of the audit of IT Disaster Recovery.	Minute 6/20 19 October 2020	When the formal follow-up review of the audit is undertaken, the findings be reported to Committee	Karen Tyler		
3	In-light of changes to rules regarding limits on exit packages, an annual update report on severance packages be submitted to the Committee.	Minute 14/20 19 October 2020	Report to Committee on an annual basis	Barry Hastie		
4	An update report on the key issues highlighted in the Audit Findings Report be submitted to a future meeting of the Committee when appropriate.	Minute 25/20 30 November 2020	Report to Committee when appropriate	Paul Jennings		
5	Procurement and Commissioning Progress Report – New Format	Minute 27/20 30 November 2020	Future reports be submitted to the Committee on a six-monthly basis - next report to be submitted in June 2021	Mick Burn		

6.	Quarter Three Internal Audit Progress Report 2020-21 – A briefing note providing further detail of planned IT audit work for 2021/22 to be submitted to the Committee when the Annual Audit Plan is submitted for consideration	Minute 34/20 25 <sup>th</sup> January 2021	To be confirmed	Karen Tyler		
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\* identifies items where a report is on the agenda for your meeting.



## Appendix 2

### Information/Action Requested Outside Meeting

	<b>Subject</b>	<b>Minute Reference and Date Originally Considered</b>	<b>Information Requested / Action Required</b>	<b>Responsible Officer</b>	<b>Date Completed</b>
1.	Annual Fraud and Error Report 2019-20	Minute 35/20 25 <sup>th</sup> January 2021	Information on the last SPD exercise undertaken in-conjunction with 3rd party to be circulated to Members of the Committee	Karen Tyler	

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### Work Programme 2020-21

#### 19<sup>th</sup> October 2020

Internal Audit Annual Report 2019-20  
Annual Governance Statement 2019-20  
Revenue and Capital Out-turn 2019-20  
Quarter One Revenue and Capital Monitoring Report 2020-21  
RIPA (Regulation of Investigatory Powers Act) Annual Report 2020  
Consideration of Approval of Severance Package (private)  
Consideration of Approval of Severance Package (private)

#### 30<sup>th</sup> November 2020

Audited Statement of Accounts 2019-20  
Audit Findings Report 2019-20 (Grant Thornton)  
Internal Audit Plan 2020-21  
Quarter Two Revenue and Capital Monitoring Report 2020-21  
Audit and Procurement Committee Annual Report 2019-20  
Complaints to the Local Government and Social Care Ombudsman 2019/20  
Six monthly Procurement Progress Report 2020-21 (private)

#### 25<sup>th</sup> January 2021

Third Quarter Internal Audit Progress Report 2020-21  
Treasury Management update  
Annual Fraud and Error Report 2019-20 (including Whistleblowing)  
Half yearly Fraud and Error Update 2020-21 (public and private)

#### 15<sup>th</sup> March 2021

Corporate Risk Register Update  
Quarter Three Revenue and Capital Monitoring Report 2020-21  
Information Governance Annual Report 2020

#### Future Meeting

Code of Corporate Governance  
Informing the Audit Risk Assessment for Coventry City Council 2020-21 (Grant Thornton)  
Annual Audit Letter 2019-20 (Grant Thornton)  
External Audit Plan Year Ending March 2021 (Grant Thornton)

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Cabinet  
Audit and Procurement Committee

16<sup>th</sup> February 2021  
15<sup>th</sup> March 2021

**Name of Cabinet Member:**

Cabinet Member for Strategic Finance and Resources - Councillor R Brown

**Director Approving Submission of the report:**

Director of Finance

**Ward(s) affected:**

City wide

**Title:**

2020/21 Third Quarter Financial Monitoring Report (to December 2020)

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**Is this a key decision?**

No

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**Executive Summary:**

The purpose of this report is to advise Cabinet of the forecast outturn position for revenue and capital expenditure and the Council's treasury management activity as at the end of December 2020. The headline revenue forecast for 2020/21 is for net expenditure to be **£33.3m** (£36.3m at Quarter 2) over budget before the application of COVID-19 emergency funding for local government. After the use of this grant, the net under-spend is **£0.5m** (£3.5m overspend at Quarter 2). At the same point in 2019/20 there was a projected underspend of £1.9m.

The position includes an underlying overspend of £9m within Children's Services although £6.7m of this has been attributed to the pandemic and funded from one-off Covid funding accordingly leaving a net overspend of £2.3m. Where financial pressures are anticipated to continue beyond the current financial year, they have been reflected in the forthcoming 2021/22 Budget Report. Underspends within Central Budgets and Housing and Transformation have helped to deliver the overall underspend position.

The Council has been able to stabilise its 2020/21 financial position both in terms of its business as usual services and the activity and impacts arising from the Covid pandemic. It is clear though that significant financial risk remains in relation to the future trajectory of Covid costs and funding. There remains a financial imperative to focus on the medium-term horizon and it is important for the Council to tackle the anticipated legacy effects of Covid.

The Council's capital spending is projected to be £231m and includes major scheme expenditure which ranges from investment in to the A46 Link Road, Coventry Station Masterplan, Whitley South infrastructure, Public Realm, Secondary Schools expansion and the National Battery Plant. The

impact of Covid has been relatively modest in terms of delays to progressing capital schemes and the Council is on track to exceed the high levels of programme spend achieved in 2019/20.

No recommendations were made by Audit and Procurement Committee in relation to the Quarter 2 report.

**Recommendations:**

The Cabinet is requested to:

- 1) Approve the Council's revenue monitoring position incorporating the application of Covid emergency funding.
- 2) Approve the revised forecast capital outturn position for the year of £231m incorporating: £4.3m net increase in spending relating to approved/technical changes, £23.9m net rescheduling of expenditure from 2021/22.

The Audit and Procurement Committee is requested to:

- 1) Consider the proposals in the report and forward any recommendations to the Cabinet.

**List of Appendices included:**

Appendix 1	Revenue Position: Detailed Directorate breakdown of forecast outturn position
Appendix 2	Capital Programme: Analysis of Budget/Technical Changes
Appendix 3	Capital Programme: Estimated Outturn 2020/21
Appendix 4	Capital Programme: Analysis of Rescheduling
Appendix 5	Prudential Indicators

**Background papers:**

None

**Other useful documents**

None

**Has it been or will it be considered by Scrutiny?**

No

**Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?**

Yes - Audit and Procurement Committee, 15<sup>th</sup> March 2021

**Will this report go to Council?**

No

**Report title:**

2020/21 Third Quarter Financial Monitoring Report (to December 2020)

**1. Context (or background)**

- 1.1 Cabinet approved the City Council's revenue budget of £238.8m on the 25th February 2020 and a Directorate Capital Programme of £232.7m. This is the third quarterly monitoring report for 2020/21 to the end of December 2020. The purpose is to advise Cabinet of the forecast outturn position for revenue and capital expenditure and to report on the Council's treasury management activity.
- 1.2 The current 2020/21 revenue forecast is for expenditure to be £0.5m under budget. This is after applying £33.8m of emergency funding received or due from Government for the purpose of managing the estimated cost of COVID-19 to the Council. The reported forecast at the same point in 2019/20 was an underspend of £1.9m. Capital spend is projected to be £231.1m, a £18m decrease since the previously reported Capital Programme for the year.

**2. Options considered and recommended proposal**

- 2.1 This is a budget monitoring report and as such there are no options.

**Revenue Position** - The revenue forecast position is analysed by service area below. The position shown for each service area assumes that all Covid costs are met from the emergency funding referenced above.

**Table 1 - Forecast Variations**

<b>Service Area</b>	<b>Revised Net Budget £m</b>	<b>Forecast Spend £m</b>	<b>Total Over/(Under) Spend £m</b>	<b>Covid Impact £m</b>	<b>Non-Covid Forecast Variation £m</b>
Adult Social Care	79.0	80.9	1.9	1.9	0.0
Business Investment & Culture	5.6	7.1	1.5	1.4	0.1
Children & Young People's Services	72.8	79.0	6.2	3.9	2.3
Contingency & Central Budgets	13.0	15.1	2.1	5.0	(2.9)
Education and Inclusion	14.3	14.3	0.0	(0.2)	0.2
Finance	3.2	4.8	1.6	1.5	0.1
Housing and Transformation	14.5	15.9	1.4	3.4	(2.1)
Human Resources	1.3	1.6	0.3	0.1	0.2
Legal and Governance Services	3.6	5.0	1.4	0.8	0.6
Directorate Management	1.4	1.5	0.1	0.0	0.1
Project Management & Property	(4.6)	(0.9)	3.7	3.5	0.2
Public Health	0.6	0.3	(0.3)	0.0	(0.3)

Streetscene and Regulatory	29.3	36.8	7.5	7.5	0.0
Transportation & Highways	4.3	10.3	5.9	5.3	0.6
<b>Sub-Total</b>	<b>238.4</b>	<b>271.7</b>	<b>33.3</b>	<b>34.2</b>	<b>(0.9)</b>
<b>Covid Grant Shortfall</b>				<b>(0.4)*</b>	<b>0.4</b>
<b>Total</b>	<b>238.4</b>	<b>271.7</b>	<b>33.3</b>	<b>33.8</b>	<b>(0.5)</b>

\*Covid Emergency Funding will be applied at year-end as contributions of specific grant. It is currently estimated to be £0.4m less than applicable costs. The expected shortfall of Council Tax and Business Rates income in 2020/21, the latest estimate of which is £6m, is not included here but will become a pressure in 2021/22 in line with accounting convention.

2.2 An explanation of the major forecast variances is provided below. Further details are provided in Appendix 1.

#### **Directorate - Covid-Related**

Most of the variations reported at quarter 3 are as a direct result of the COVID-19 impacts across the City Council totalling c£34m. It must be stressed that the differentiation between Covid and non-Covid costs is subject to significant estimation uncertainty. These variations stood at £33m at Quarter 1.

Children and Young People's Services continues to account for a significant amount of the overspend caused by both the total number of placements and the average unit cost of those placements, as well as a continued reliance on agency staff to manage the increase in caseloads. During quarter 3, £2.8m of specific Contain Outbreak Management Fund grant has been used to reduce the total overspend from £9.0m to £6.2m, of which £3.9m is judged to be the result of Covid leaving a net overspend of £2.3m. The impact of the latest lockdown is as yet unknown.

A significant proportion of Covid impacts relate to income which has not been achievable under lockdown or which may not be achievable in subsequent months whilst recovery takes place. This includes c£3m potential rent losses and associated pressures in respect of the Council's commercial property portfolio and £5m in respect of significantly reduced car parking, bus gate and parking enforcement activity. Other lower but still significant Covid related income shortfalls are expected in other service areas including land charges, court costs, planning, commercial waste, parks, the Outdoor Education Service and other school traded services.

Covid has also resulted in expenditure pressures across a range of other services including; Adult Social Care costs of £1.9m including provider support, Personal Protective Equipment costs of £1.6m; provision of emergency mortuary capacity of £1.6m; waste disposal and safe working costs within Waste and Street Services of £1.5m; and the impact on the cost of housing rough sleepers during lockdown and expected activity increase in housing of £1.3m.

#### **Directorate - Non-Covid**

The Quarter 2 position also includes a number of variations which are separate from those attributable to Covid.

This overall non-Covid overspend in Children and Young People's Services is £2.3m. Significant spend pressures include the additional costs of looked after children placements as a result of delays in the delivery of Children's placement transformation, higher unit cost of placements partly attributable to the youth violence in the city, an increase in support packages for disabled children and the use of allowances to promote permanence outcomes for children.



Transportation and Highways is reporting a £0.6m non-Covid overspend due mostly to underlying Pre-Covid pressure in relation to car parking and bus gate enforcement income levels. A further net overspend of £0.6m within Legal and Governance Services relates mainly to the £0.25m cost of agency staff to cover vacancies within the Legal Services team, an underlying £0.2m cost of external legal fees for care proceedings and an underlying pressure of £0.1m in the Coroner's Service as a result of increased costs and volumes.

The Housing and Transformation underspend of £2.1m reflects a number of initiatives to provide cheaper and more suitable temporary accommodation and to reduce the unit costs (e.g. caradoc, acquisitions, market negotiations). This has prevented more homelessness cases arising and created a sustained reduction of households in temporary accommodation. The number of households living in TA has decreased significantly over the last 6 months from a high of 760 to an average of less than 550 each night during Quarter 3.

### Contingency and Central Budgets

Quarter 3 Covid impacts incorporate a £1.9m estimated under-achievement of dividends and potential impairment of the Council's Collective Investment Funds (a treasury investment) and its long-term debtors totalling £3.1m. These will be subject to further review at the year-end.

Other than this, central budgets are forecast to underspend by £2.9m incorporating lower than budgeted borrowing and capital financing costs within the Asset Management Revenue Account and an underspend on the Council's superannuation budgets. The position shown is after funding Materials Recycling Facility development costs of £0.8m approved by Cabinet in August 2019. The position does not include the previously assumed over-achievement of Business Rates Pool income due to uncertainties nationally over potential business rating appeals being considered by the Valuation Office Agency.

### Covid-Related Grants

The Government has announced a range of grant funding allocations to manage the financial impact of COVID-19 and deliver services to mitigate or address the effects of the pandemic.

**Table 2: Covid Funding Allocations**

	<b>2020/21 Grant Value</b>
<b>Funds Council Expenditure</b>	<b>£000</b>
Emergency Funding (4 tranches*)	(33,190)
Adult Social Care Infection Control Fund (4 Tranches)	(5,545)
Contain Outbreak Management Fund (initial 3 tranches**)	(4,459)
Sales, Fees and Charges Income Loss (2 tranches)	(3,602)
Test and Trace Support Grant	(2,041)
Covid Winter Grant Scheme	(1,293)
Community Testing (Lateral Flow Testing)	(606)

Hospital Discharge Scheme (2 tranches)	(959)
Adult Social Care Workforce Grant	(775)
Adult Social Rapid Testing Fund	(665)
Community Champions Funding	(499)
Emergency Assistance Grant for Food & Essential Supplies	(479)
Next Steps Accommodation Programme (CCC revenue element)	(401)
Re-Opening High Streets Safely Fund	(334)
Home to School Transport	(236)
Compliance and Enforcement (Surge) Grant	(222)
Clinically Extremely Vulnerable	(199)
Business Grants New Burdens Funding	(170)
Unaccompanied Asylum Seeker Children Funding	(60)
	<b>(55,735)</b>

\* £2.8m of this amount was spent in 2019/20.

\*\*Further tranches of the Contain Outbreak Management Fund totalling £4.5m are likely to be due by year-end.

This includes £33.2m in four allocations of overall emergency funding plus claims of £3.6m for sales, fees and charges income loss, the combined total of which will be used to manage the overall Council bottom line. The remaining grants are intended to address specific priority areas, the large majority of which will be utilised to deliver the purposes highlighted by grant determinations, subject to local requirements. Most of the funding has already been received for the current list of grants shown above.

### 2.3 Capital

The quarter 3 2020/21 capital outturn forecast is £231m compared with the original programme reported to Cabinet in February 2019 of £232.7m. Table 3 below updates the budget at quarter 3 to take account of a £4.3m increase in the programme from approved/technical changes, £23.9m of net rescheduling now planned to be carried forward into future years.

The resources available section of Table 3 explains how the Capital Programme will be funded in 2020/21. It shows 77% of the programme is funded by external grant monies, whilst 16% is funded from borrowing. The programme also includes funding from capital receipts of £11.1m.

**Table 3 – Movement in the Capital Budget**

CAPITAL BUDGET 2020-21 MOVEMENT	Qtr 3 Reporting £m
Estimated Outturn Quarter 2	249.1
Approved / Technical Changes (see Appendix 2)	5.9
“Net” Overspend (See Appendix 3)	0.0
“Net” Rescheduling into future years (See Appendix 4)	(23.9)
Revised Estimated Outturn 2019-20	231.1

RESOURCES AVAILABLE:	Qtr 3 Reporting £m
Prudential Borrowing (Specific & Gap Funding)	36.5
Grants and Contributions	177.2
Capital Receipts	11.1
Revenue Contributions and Capital Reserve	6.3
Total Resources Available	231.1

## 2.4 Treasury Management

### Interest Rates

The Base Rate was maintained at 0.10% by the Bank of England in December 2020. The medium-term outlook is increasingly weak. Whilst the strict initial lockdown measures put in place to protect against COVID-19 were eased, subsequent waves of infections has prompted more restrictive measures on a regional and national basis, which means it is likely to be at least the first Quarter of 2022 before consumer demand returns to pre-pandemic levels. As a result, current forecasts predict the base rate will remain at 0.10% until at least the first quarter of 2024. However, further interest rate cuts to zero or possibly negative, cannot yet be completely ruled out.

### Long Term (Capital) Borrowing

The net long term borrowing requirement for the 2020/21 Capital Programme is £25.7m, taking into account borrowing set out in Section 2.3 above (total £36.5m), less amounts to be set aside to repay debt, including non PFI related Minimum Revenue Provision (£10.8m). During 2020/21 the Council undertook £18m of borrowing from the West Midlands Combined Authority (WMCA) as part of the funding package of the UK Battery Innovation Centre. The Council has no immediate plans to take any further new long-term borrowing, however, this will be kept under review.

In November 2020, the Public Works Loan Board (PWLB) cut its lending rates by 1%. However, the ability to use this facility does not come without strings. The Treasury announced that from now on, Councils can only borrow from PWLB if finance directors “confirm that there is no intention to buy investment assets primarily for yield” in the three years following a loan. Finance directors will also need to submit a plan for capital spending and financing plans covering the forthcoming three years. Further restrictions mean PWLB will not lend to a council planning to buy assets for yield “regardless of whether the transaction would notionally be financed from a source other than the PWLB.” Failure to comply with the rules could lead to a council being banned from using the PWLB borrowing facility.

Interest rates for local authority borrowing from the Public Works Loans Board (PWLB) between 1<sup>st</sup> October and 31 December 2020 have varied within the following ranges:

<b>PWLB Loan Duration (maturity loan)</b>	<b>Minimum 2020/21 to Q3</b>	<b>Maximum 2020/21 to Q3</b>	<b>As at the End of Q3</b>
5 year	0.92%	2.10%	0.95%
50 year	1.52%	2.91%	1.60%

The PWLB now allows qualifying authorities, including the City Council, to borrow at 0.2% below the standard rates set out above. This “certainty rate” initiative provides a small reduction in the cost of future borrowing.

Regular monitoring continues to ensure identification of any opportunities to reschedule debt by early repayment of more expensive existing loans replaced with less expensive new loans. The premiums payable on early redemption usually outweigh any potential savings.

### **Short Term (Temporary) Borrowing and Investments**

In managing the day to day cash-flow of the Council, short-term borrowing or investments are undertaken with financial institutions and other public bodies. As at 31/12/2020 the Council held £57m of short-term borrowing from other public bodies at an average interest rate of 0.95%. This borrowing was solely used to facilitate an up-front payment of the Council’s employer pension contributions to the West Midlands Local Government Pension Fund.

Returns provided by the Council’s short-term investments yielded an average interest rate of 0.32% over the last 12 months. This rate of return reflects low risk investments for short to medium durations with UK banks, Money Market Funds, Certificates of Deposits, other Local Authorities, Registered Providers and companies in the form of corporate bonds.

Although the level of investments varies from day to day with movements in the Council’s cash-flow, investments held by the City Council identified as a snap-shot at each of the reporting stages were: -

	<b>As at 30<sup>th</sup> June 2020</b>	<b>As at 30<sup>th</sup> September 2020</b>	<b>As at 31<sup>st</sup> December 2020</b>
	<b>£m</b>	<b>£m</b>	<b>£m</b>
Banks and Building Societies	0.0	0.0	0.0
Money Market Funds	37.0	67.8	35.0
Local Authorities	0.0	5.0	5.0
Corporate Bonds	0.0	0.0	0.0
Registered Providers	10.0	10.0	10.0
<b>Total</b>	<b>47.0</b>	<b>82.8</b>	<b>50.0</b>

### **External Investments**

In addition to the above investments, a mix of Collective Investment Schemes or “pooled funds” is used, where investment is in the form of sterling fund units and non-specific individual investments with financial institutions or organisations. These funds are generally AAA rated, are highly liquid as cash, can be withdrawn within two to four days, and short average duration. The Sterling investments include Certificates of Deposits, Commercial

Paper, Corporate Bonds, Floating Rate Notes, Call Account Deposits and Equities. These pooled funds are designed to be held for longer durations, allowing any short-term fluctuations in return to be smoothed out. In order to manage risk these investments are spread across a number of funds.

Returns provided by the Council's pooled funds yielded an average interest rate of 4.22% over the last 12 months.

As at 31<sup>st</sup> December 2020 the pooled funds were valued at £28.3m, against an original investment of £30m. This is spread across the following funds: CCLA, Schroders, Investec, Columbia Threadneedle and M&G Investments.

Whilst the pooled funds continue to provide an annualised return, their capital value has decreased. This is mainly due to the impact of Covid-19. Normally, this would not be an issue unless the Council intended to disinvest from the funds (the intention is that the Council keeps these for the long-term) however, there is currently a statutory override for gains and losses on pooled investment funds held outside of a pension fund being taken to revenue. This was introduced in 2018 following a change to International Financial Reporting Standards (IFRS). At the time, the government felt it was inappropriate for revaluations to "impact on the balanced budget requirement or on the quantum of funds available to support delivery of services." But this override is time-limited and is due to expire in April 2023. If the override is not extended, then the Council will be required to offset these capital losses against the revenue budget.

### **Prudential Indicators and the Prudential Code**

Under the CIPFA Prudential Code for Capital Finance authorities are free to borrow, subject to them being able to afford the revenue costs. The framework requires that authorities set and monitor against Prudential Indicators relating to capital, treasury management and revenue issues. These indicators are designed to ensure that borrowing for capital purposes is affordable, sustainable and prudent. The purpose of the indicators is to support decision making and financial management, rather than illustrate comparative performance.

The indicators, together with the relevant figures as at 31<sup>st</sup> December 2020 are included in Appendix 5. This highlights that the City Council's activities are within the amounts set as Performance Indicators for 2020/21. Specific points to note on the ratios are:

- The Upper Limit on Variable Interest Rate Exposures (indicator 9) sets a maximum amount of net borrowing (borrowing less investments) that can be at variable interest rates. At 31<sup>st</sup> December the value is -£58.3m (minus) compared to +£87.9m within the Treasury Management Strategy, reflecting the fact that the Council has more variable rate investments than variable rate borrowings at the current time.
- The Upper Limit on Fixed Interest Rate Exposures (indicator 9) sets a maximum amount of net borrowing (borrowing less investments) that can be at fixed interest rates. At 31<sup>st</sup> December the value is £300.5m compared to £439.5m within the Treasury Management Strategy, reflecting that a significant proportion of the Council's investment balance is at a fixed interest rate.

### **3. Results of consultation undertaken**

3.1 None

### **4. Timetable for implementing this decision**

4.1 There is no implementation timetable as this is a financial monitoring report.

## 5. Comments from the Director of Finance and the Director of Law and Governance

### 5.1 Financial implications

#### Revenue

Further Government support has been announced in the third quarter to help the Council fund the extended and significant effects of Covid. The recent extension to and strengthening of restrictions will continue to affect the Council's financial position and this will need to be monitored closely for the remainder of the year. Financial implications could still emerge or worsen in several service areas and in estimates of the balance sheet impact. The Council has so far managed its 2020/21 financial position through the combination of general Covid funding plus a range of additional more specific Covid grants. However, it is likely that funding for Covid related impacts will fall away quite quickly in 2021/22 whereas some of the costs are likely to be longer term or even structural.

The Institute for Fiscal Studies' recent analysis of the Local Government Spending Review highlighted the potential for longer-run and indirect effects of the Covid crisis on the issues such as chronic ill-health and safeguarding issues, which need to be managed by the local authority sector in the future on top of pre-existing demand and cost pressures. In addition, the Council has expressed its intention to provide greater focus on areas which have been adversely affected under Covid such as domestic abuse, mental health and the local economy.

As a result, it is crucial for the Council to manage its Covid resources on a multi-year basis, maximising the use of specific and time-limited Covid grants in-year but managing more general and flexible funding to support Covid priorities running into next financial year. Government guidance issued more recently for the more restrictive funding streams is increasingly referring to the flexibility to carry resources forward to next financial year, indicating a recognition of the multi-year nature of the issue.

Risks and uncertainty remain into 2021/22 demonstrated most clearly by this year's headline £9m Children and Young People's overspend and some of the large reductions in a range of income sources. In addition to these risks, the challenge facing the Council will be how it emerges from the pandemic and its ability to maintain momentum in supporting the range of capital and project-based developments on the horizon. Therefore, as well as safeguarding Covid funding to manage the continued impact of the pandemic there is now a focus on identifying any resources that become available to help pump-prime longer-term developments. The forthcoming Budget Report to outline will contain further details on this proposal.

In terms of the financial pressures resulting from Covid that have been identified to date the Council should be close to managing its 2020/21 position. The table below shows the current position indicating an unfunded Covid pressure of £0.4m.

	£m
Confirmed Covid Emergency Funding	(33.8)
2020/21 Pressures	34.2
Unfunded Balance	0.4

In addition, local government will be able to claim further grant to recompense it for part of its income pressures later in the year whilst further grant allocations (aligned with new responsibilities) continue to be announced and issued, the detail of which continue to be worked through. It is important to note that the 2020/21 position does not include the impact on the Council's Collection Fund (Council Tax and Business Rates) income. Accounting convention requires Collection Fund losses that arise in-year to be accounted for in the following year. The Council's 2021/22 Budget proposals incorporate forecast losses from 2020/21 and although the Government has provided some compensation for such losses, in Coventry's case it is clear that these losses will not be compensated in full.

As part of the quarter 2 monitoring report, Cabinet approved the Council's approach to managing its Covid grant funding by either putting in place programmes or specific measures specified by Government within its grant determinations or managing pressures from the additional expenditure incurred and income lost as a result of COVID-19 and/or balancing the overall bottom line as appropriate.

It is clear that the Council is facing a number of significant financial risks currently and looking forward: renewed pressure on children's budgets which total £9m this year; the prospect of permanent societal changes affecting its income base; unchartered impacts on its Council Tax and Business Rates environments; and the need to prepare its services for potential further pandemic events.

The forthcoming 2021/22 Budget report (based on the earlier Pre-Budget Report and the results of the Provisional Local Government Settlement) will establish a balanced Budget position whilst acknowledging the heightened financial risks facing the Council. The combination of uncertainty facing local government finance beyond 2021/22 and the continued (and potentially permanent) impacts of Covid mean that many of the fundamental elements of the financial plan are fluid at present meaning that medium term financial planning will continue to be challenging.

### **Capital**

The Council's capital programme plans continued to be progressed despite the lockdown conditions in place during several periods this year. Although there was an impact on some areas of the programme (in particular some city centre public realm works) most schemes worked at or approaching full capacity. The programme continues to reflect major schemes that are being delivered over several years such as the UK Battery Industrialisation Centre, Whitley South Infrastructure, Public Realm and the Coventry Station Masterplan, all of which now have a very visible physical presence in the city. The current forecast programme, if achieved, will surpass the very large programme achieved in 2019/20.

The largest areas of rescheduling in the third quarter involve some of the strategic projects which will help to change the face of the city. The UK Central and Connectivity programme for the A46 Stoneleigh Junction scheme and delays associated approval from Highways England, and adverse weather for the lift of the new footbridge and canopy for Coventry Station Masterplan, has deferred contract payment as they are based on activity.

## **5.2 Legal implications**

None

## **6. Other implications**

### **6.1 How will this contribute to the Council Plan ([www.coventry.gov.uk/councilplan/](http://www.coventry.gov.uk/councilplan/))?**

The Council monitors the quality and level of service provided to the citizens of Coventry and the key objectives of the Council Plan. As far as possible it will try to deliver better value for money and maintain services in line with its corporate priorities balanced against the need to manage with fewer resources.

### **6.2 How is risk being managed?**

The need to deliver a stable and balanced financial position in the short and medium term is a key corporate risk for the local authority and is reflected in the corporate risk register. Budgetary control and monitoring processes are paramount in managing this risk and this report is a key part of the process. The impact of Covid has represented a heightened level of financial risk over this period. The Council has sought to take a proportionate approach to supporting key sectors, partners and vulnerable groups ensuring that a fundamental safety net is provided but doing so in a financially sustainable way, ensuring that the Council can maintain legacy support within the broad financial envelope indicated by Government emergency funding announcements.

### **6.3 What is the impact on the organisation?**

It remains important for the Council to ensure that strict budget management continues to the year-end. The Council continues to monitor any changes to the financial position represented by Covid and these have been reflected in the current Budget process.

### **6.4 Equalities / EIA**

No impact.

### **6.5 Implications for (or impact on) climate change and the environment**

No impact at this stage although climate change and the environmental impact of the Council's decisions are likely to feature more strongly in the future.

### **6.6 Implications for partner organisations?**

No impact.



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This report is published on the council's website: [www.coventry.gov.uk/councilmeetings](http://www.coventry.gov.uk/councilmeetings)

## **Appendix 1 Revenue Position: Detailed Directorate Breakdown of Forecasted Outturn Position**

Budget variations have been analysed between those that are subject to a centralised forecast and those that are managed at service level (termed “Budget Holder Forecasts” for the purposes of this report). The Centralised budget areas relate to salary costs – the Council applies strict control over recruitment such that managers are not able to recruit to vacant posts without first going through rigorous processes. In this sense managers have to work within the existing establishment structure and salary budgets are not controlled at this local level. The Centralised salaries and Overheads under-spend shown below is principally the effect of unfilled vacancies.

	Revised Budget	Forecast Spend	Centralised Forecast Variance	Budget Holder Forecast Variance	Total Forecast Variance	Less Covid Impact	Net Forecast Variance
	£m	£m	£m	£m	£m	£m	£m
Adult Social Care	79.0	80.9	0.0	1.9	1.9	1.9	0.0
Business Investment & Culture	5.6	7.1	0.2	1.4	1.6	1.4	0.1
Children & Young People's Services	72.8	78.9	(1.9)	8.1	6.2	3.9	2.3
Contingency & Central Budgets	13.0	15.1	0.0	2.1	2.1	5.0	(2.9)
Education and Inclusion	14.3	14.3	(0.4)	0.4	(0.0)	(0.2)	0.2
Finance	3.2	4.8	(0.1)	1.7	1.6	1.5	0.1
Housing & Transformation	14.5	15.9	0.1	1.2	1.4	3.4	(2.1)
Human Resources	1.3	1.6	0.1	0.1	0.3	0.1	0.2
Legal & Governance Services	3.6	5.0	(0.1)	1.4	1.4	0.8	0.6
People Directorate Management	1.4	1.5	0.0	0.0	0.1	0.0	0.1
Project Management & Property Services	(4.6)	(0.9)	0.0	3.7	3.7	3.5	0.2
Public Health	0.6	0.3	0.1	(0.4)	(0.3)	0.0	(0.3)
Streetscene & Regulatory Services	29.3	36.8	(0.2)	7.8	7.5	7.5	(0.0)
Transportation & Highways	4.3	10.3	(0.0)	6.0	5.9	5.3	0.6
	238.4	271.7	(2.1)	35.4	33.3	34.2	(0.9)
						(0.4)	0.4
<b>Total</b>	<b>238.4</b>	<b>271.7</b>	<b>(2.1)</b>	<b>35.4</b>	<b>33.3</b>	<b>33.8</b>	<b>(0.5)</b>

## Budget Holder Forecasts

Service Area	Reporting Area	Explanation	£m
Education and Skills	SEND & Specialist Services	The Qtr. 3 forecast for SEN Home to School Transport is projecting a £1.2M under spend for 2020/21. The forecast includes reduced spending during the Summer term due to Covid-19. As a consequence of social distancing some additional costs have been incurred from September 2020, however a government grant has been received which offset this during the Autumn term. It is expected that this funding stream will continue into Spring Term. A percentage has been built into the forecast to account for a slight increase in special school places from September 2020. SEND Support Services are forecasting an over spend of £0.1M which is fully offset by a centralised under spend.	(1.1)
Education and Skills	Education Entitlement	Plas Doly Moch is forecasting an over spend of £0.5M as a result of Covid-19. The centre is currently closed and is therefore not able to generate income via fees & charges. Government support has been accessed where possible and all expenditure has been reviewed to reduce spending. Avenues are currently being explored in relation to other forms of income generation. The Education Welfare service is forecasting an over spend of £125k. This is due to a reduction in income from Fixed Penalty Notices relating to non-attendance as a result of Covid-19. The budget for the Woodlands site is reporting an over spend of £45k because of reduced income from leisure activities due to Covid-19. Other traded services within Education Entitlement are forecasting over spends as a result of an expected reduction in school and / or parental income due to Covid-19. Work is ongoing to explore options to mitigate this, including the submission of a claim to the governments compensation scheme for lost sales, fees & charges.	0.8
Education and Skills	Employment & Adult Education	To date it has not been possible to deliver the outstanding £189k financial savings target set as part of previous budget setting processes to ensure we maximise ESFA grant funding against internal training programmes. Due to the impact of Covid-19 and the resulting switch to virtual learning Adult Education are forecasting a reduction in income generated via fees and charges. This is forecast to create a budgetary pressure of £64k. The Employment Service are forecasting an over spend of £279k but this is fully offset by a corresponding under spend against centralised salaries.	0.5
Education and Inclusion	Other Variances Less than 100K		0.1
<b>Education and Inclusion</b>			<b>0.4</b>
Children and Young People's Services	Commissioning, QA and Performance	The budget holder variance in Quality Assurance primarily relates to 3 particular areas, the growth of 3 positions within the Professional Support Service where the relevant funding is pending transfer; 2 related to the growth of the internal fostering service and 1 in relation to grant funding being received by the	0.4

		throughcare service. An income target related to training through safeguarding in education where it has been necessary to reduce the forecast income as a result of COVID-19, the shortfall and subsequent impact has been added to the COVID spend tracker. An overspend relating to an increase in agency costs across the service this is due to increased number of children who are LAC and those that have become subject to a CPP. The Quality Assurance service continues to recruit to and fill permanent vacancies to offset this overspend.	
Children and Young People's Services	Help & Protection	Help and Protection overspend relates in the main to agency staff who are covering vacant posts and those on maternity leave. Recruitment continues to be a priority for children's services. The increase also relates to 12 Social Worker posts within the Academy which are considered supernumery for the first 6 months before they move to a vacant post. This has been funded from the agency budgets as it will support Children's Services in reducing agency staff. However the immediate increase in demand and the impact of Covid-19 on staffing has prevented agency staff numbers from reducing creating additional financial pressure.	1.7
Children and Young People's Services	LAC & Care Leavers	There has not been a significant swing from Q2. The impact of Covid-19 continues to place pressure on the Placements budget due to an increase of over 10% in the number of looked after children since April, an increase in external placement unit costs and the need to protect children from the hidden harm they were exposed to during the Covid lockdown periods. Remands to custody as a consequence of youth violence are at the highest ever and there is a shortfall of £885k in the grant to offset this. Discharges from care have slowed as throughput by the courts has decreased. Other pressures include the need to use agency staff, the increase in support packages for disabled children and the use of allowances to promote permanence outcomes for children. The impact of the latest (January) lockdown is as yet unknown.	8.8
Children and Young People's Services	Children's Services Management Team	Overspends from budget removed in COVID activity top-slice, management turnover target not being met and additional staffing costs due to additional Academy team approved. Significant new resources for wider service pressures from £2.8m of Contain Outbreak Management Fund grant allocated in quarter 3.	(2.8)
<b>Children and Young People's Services</b>			<b>8.1</b>
Adult Social Care	Strategic Commissioning (Adults)	£0.2m underspend relates to Carers budgets. Work is underway to enhance the support offer to carers for the next 12 months. £0.7m underspend relates to transport following the suspension of day opportunities earlier in the year and also ongoing reduced capacity as result of COVID-19. £0.2m overspend relates to the PFI contract and a number of factors including reduced income from resident charges due to the impact of COVID on occupancy levels.	<b>(0.7)</b>

Adult Social Care	Internally Provided Services	Overspends on other pay and overtime which have been offset by underspends on centralised salary costs.	<b>0.1</b>
Adult Social Care	All Age Disability and Mental Health Community Purchasing	Residential and community provision has remained stable within Learning Disability services and tracking against forecast. Within Mental Health services we are continuing to see increasing demand for services, which is causing increased pressures on services. Adjustments are being made to the forecast to take these pressures into account, and these will be closely monitored over the coming months with further adjustments made as required	<b>4.1</b>
Adult Social Care	All Age Disability and Mental Health Operational	There remains significant pressures in Deprivation of Liberty Assessment demand leading to additional assessment costs. The all Age Disability Team has also seen increasing demand alongside staff turnover. Ensuring statutory need is met has been essential and has resulted in additional agency cost.	<b>0.4</b>
Adult Social Care	Adult Social Care Director	There are 2 significant variations which make up the budget holder variance. A £1.9m overspend due to specific COVID-19 related spend which will be resourced alongside other corporate Covid related expenditure as well as a £3.1m underspend representing the use of iBCF and other resources to manage the underlying Adult Social Care financial position. Whilst iBCF grant has been provided to assist with managing the position, it is unlikely to be sufficient to manage the longer term cost impact of the pandemic. The contributory factors that make up the overspend are reflected within the adjacent explanations.	<b>(1.2)</b>
Adult Social Care	Older People Community Purchasing	Residential placements have plateaued over the quarter, following a slight increase in the last quarter. The latest increase in Covid infections may be one reason for this. The residential and nursing numbers are being monitored monthly and forecasts adjusted taking into account demand profiles. Where possible we continue to promote the care of residents in their own homes or in Housing with Care.	<b>(1.0)</b>
Adult Social Care	Other Variances Less than 100K		0.2
<b>Adult Social Care</b>			<b>1.9</b>
Housing Services & Transformation	Customer and Business Services	COVID continues to be impacting on a number of service areas– particularly in Post & Fastprint with reduced levels of income which is offset to some degree by reduced postal costs.	0.2
Housing Services & Transformation	Housing and Homelessness	The service has worked on a number of initiatives to provide cheaper and more suitable temporary accommodation and to reduce the unit costs (e.g. Caradoc, acquisitions, market negotiations) whilst also preventing more homelessness, thus creating a sustained reduction of households in temporary accommodation. The number of households living in TA has decreased significantly over the last 6 months from a high of 760 to an average of less than 550 each night during Quarter 3. This work combined with	(1.4)

		the additional budget resource has resulted in a forecast of a Budget Holder underspend of £1.5m in 20/21. The underspend is despite incurring £1.25m of COVID-related expenditure. Had it not been for these costs, the Budget Holder underspend would have been £2.8m. However there is a risk of increased demand which could impact on the forecast.	
Housing Services & Transformation	Procurement	The Budget Holder forecast overspend relates to the following: cross-Council PPE of £1.7m - all relating to Covid 19 and under-achievement on both streams of rebate income of £74k - £60k of which is Covid related partially offset by underspends and other income totalling £54k.	1.7
Housing Services & Transformation	ICT & Digital	The current forecast position is largely a result of the following factors: some COVID-19 related pressures (circa £230k) , a general increase in demand for ICT kit and services and price increase (circa £210k) and a worsening income position from traded services (circa £200k). Management action is being taken to look to address these pressures although it is recognised that the COVID-19 situation has accelerated an already growing demand for ICT kit and services such as laptops, mobile phone and user accounts. The increase in unit price for equipment such as laptops is due to the global demand and some supply chain issues. Work is being done to re-baseline the organisations core requirement for ICT kit aligning closely with organisational design activity as a result of COVID-19. Unfortunately, the worsening position on income from traded services may be impacted further by the COVID-19 situation and the current national lockdown. This may result is an increased overspend by year end.	0.7
<b>Housing Services &amp; Transformation</b>			<b>1.2</b>
Legal & Governance Services	Legal Services	The COVID-19 lockdown and related restrictions have had a negative impact on income streams within the Register Office and the Records & Land Charges services forecast at c£0.3m. Additionally, the pandemic has necessitated additional Legal agency staff and external legal fees for care proceedings estimated to be £320k. Other variations reflect a £250k cost of agency staff to cover vacancies within the Legal Services team, an underlying c£220k cost of external legal fees for care proceedings, and an underlying pressure of £100k in the Coroner's Service as a result of increased costs and volumes.	1.4
<b>Legal &amp; Governance Services</b>			<b>1.4</b>
Finance	Revenues and Benefits	COVID-19 impact has resulted in a significant reduction in court cost income of around £800k due to the suspension of liability order applications, and an increase in off-site processing required to cope with extra demand of £40k. Other variations are due to a Housing Benefit subsidy pressure of c£0.8m due to an increase in the unit cost of supported exempt accommodation for which the council only receives partial subsidy payments for if the provider is not a registered social landlord. At the same time, the	

		Council has less opportunity to recover overpayments due to customers transferring to Universal Credit and the effects of COVID.	
Finance		Other Variances Less than 100K	(0.1)
			<b>1.7</b>
Business Investment and Culture	Sports, Culture, Destination & Bus Relationships	COVID pressures resulting from the closure of the sports Trust c£0.5m, and the Wave c£0.4m. The residual deficit is a net deficit whilst St Marys guildhall is closed for development c£0.2m	1.1
Business Investment and Culture	CCD Management & Support	COVID pressure is c£0.2m unachieved income relating to the sponsorship commercialisation target	0.2
Business Investment and Culture	Other Variances Less than 100K		0.1
<b>Business Investment and Culture</b>			<b>1.4</b>
Transportation & Highways	Traffic	The majority of pressures (c£5m) are due to a significant reduction in parking and enforcement income during the COVID-19 lockdown period, based on an assumed phased improvement in activity over the coming months which is unlikely to return to pre-COVID levels. Other variations are primarily due to the delayed implementation of a new fee structure for residents' parking permits.	5.3
Transportation & Highways	Highways	This is primarily the impact of DLO being stood down from April to June 2020 due to Covid 19 meaning that the service was unable to recover c£0.5m of its costs and overheads. This will be offset slightly from fees earned on external works in the latter part of the year	0.4
Transportation & Highways	TH Management & Support	Temporary management arrangements for senior posts	0.1
Transportation & Highways	Other Variances Less than 100K		0.2
<b>Transportation &amp; Highways</b>			<b>6.0</b>
Streetscene & Regulatory Services	Streetpride & Parks	The pressures in this area are predominantly COVID related income losses of £0.4m due to the closure of parks and cancellation of events. There have also been a number of covid cost pressures totalling £0.4m for staffing, cleaning and additional vehicles to maintain safe working. Other pressures primarily include costs of Agency Staff and OT of £180k, higher fleet costs of £196k, Traveller Incursion works £86k, delayed implementation of the WMP Parking charges £120k offset by a number of smaller underspends totalling £138k.	1.3
Streetscene & Regulatory Services	Regulatory Services	This relates to reduced activity in Building Control and Regulatory Services which collectively are resulting in reduced income of over £0.1m.	0.1
Streetscene & Regulatory Services	Planning	Lower planning related activity is causing a loss of Income of c£0.4m due to Covid 19. The remaining c£0.2m relates to additional temporary staffing related	0.6

		and consultancy costs, largely offset by salary underspends.	
Streetscene & Regulatory Services	Waste & Fleet Services	<p>The main pressures are COVID related and include Waste Disposal £0.75m (increased tonnages &amp; gate fees) loss of £0.6m Commercial Waste income, loss of £1.4m passenger transport income, Domestic Waste &amp; Fleet pressures of £0.6m and £0.17m to ensure safe working, and loss of Taxi Licensing income of £0.2m</p> <p>The wider overspends primarily relate to a waste disposal of £0.2m, the cost of Christmas collections of £0.15m and £0.2m higher than budgeted vehicle costs, partially offset by a one off underspend on fleet financing costs of £0.6m, and an underlying upturn in commercial waste income in the latter part of the financial year of £0.4m.</p>	3.4
Streetscene & Regulatory Services	SSGS Management & Support	This pressure is almost entirely due to the Regional Mortuary facility costs which are being funded from the COVID 19 emergency resources.	2.0
Streetscene & Regulatory Services	Environmental Services	COVID pressures £135k relating to loss of income for Pest Control service during lockdown period, £124k agency & overtime cover for shielding staff and £27k reduced Fixed Penalty Notice income. Other variations relate reduced ESU income £53k.	0.3
<b>Streetscene &amp; Regulatory Services</b>			<b>7.8</b>
<b>Human Resources</b>	Human Resources	Other Variances Less than 100K	<b>0.1</b>
Project Management and Property Services	Commercial Property and Development	This is primarily commercial rent loss resulting from the Covid-19 pandemic estimated at c£3m.	2.9
Project Management and Property Services	Facilities & Property Services	Security/holding costs of the vacant Fairfax Street building continue estimated at c£0.3m, the remainder being Covid related PPE and building compliance costs of c£0.35m	0.5
Project Management and Property Services	PMPS Management & Support	The commercial property acquisition target will under achieve by c£0.2m.	0.2
Project Management and Property Services		Other Variances Less than £100K	<b>0.1</b>
<b>Project Management and Property Services</b>			<b>3.6</b>
Public Health	Public Health - People	Reduction in budgeted contract costs	(0.1)
Public Health	Public Health - Lifestyles	Reduction in service delivery as resources moved to support COVID response	(0.1)
Public Health	Other Variances Less than 100K		(0.2)



<b>Public Health</b>			<b>(0.4)</b>
Ringfenced Funding	SEND & Specialist Services	This is predominately attributable to a significant increase in demand for external specialist placements for: primary and secondary SEMH (local provision is exhausted); specialist provision for LAC resident in other LAs; new and extended FE placements from Sept 2020 and unit costs increases throughout the system.	1.7
Ringfenced Funding	Schools	DSG: This under spend is a combination of £1.9m High Needs Unallocated Resource, £0.3m Growth Fund & £0.1m Early Years Adjustment.	(2.3)
Ringfenced Funding	Education Entitlement	DSG: The New Arrivals fund is forecasting an under spend of £38k due to a reduction in the number of pupils being admitted to schools due to Covid-19. There are other small under spends across a number of different budgets within Education Entitlement.	(0.2)
Ringfenced Funding	Financial Strategy	Technical adjustment to remove total of ringfenced variances from corporate position	0.8
<b>Ringfenced Funding</b>			<b>0.0</b>
Corporate & Contingency	Corporate Finance	Estimated Covid impact from a £1.9m under-achievement of dividends and impairment of the Council's Collective Investment Funds (a treasury investment) and its long-term debtors totalling £3.1m. This is offset by £2.9m lower than budgeted borrowing and capital financing costs within the Asset Management Revenue Account and an underspend on the Council's superannuation budgets. The position shown is after funding Materials Recycling Facility development costs of £0.8m approved by Cabinet in August 2019.	2.1
<b>Contingency &amp; Central</b>			<b>2.1</b>
<b>Total Non-Controllable Variances</b>			<b>35.4</b>

## Appendix 2

### Approved / Technical Changes

SCHEME	EXPLANATION	£m
On-Street Residential Chargepoint Scheme Phase 3 & 4	The Office for Low Emission Vehicles (OLEV) has awarded Coventry City Council, a grant of £0.8m. The purpose of the grant is to install on-street charge points for local residents wishing to charge their plug-in electric vehicles.	0.8
Active Travel Fund tranche 2	Funding awarded from Department of Transportation in response to Covid-19 to deliver and improve cycle routes within the city.	0.2
Green Homes Grant	Approved at Cabinet Member Meeting on 21st October, new grant award in total £530,000 from BEIS Low income households towards the costs of energy efficient measures.	0.3
City of Culture	Additional Getting Building Fund Grant approved by emergency powers on 5 <sup>th</sup> August 20. This is part of an overall grant award to the Local Authority of £19.8m. £3.3m cashflow in 20/21 to aid the completion and complement the CoC programme including Fargo Village remodelling; Digital Gallery; Unique Visitors Centre etc	3.3
Mixed Recycling Facility	Removing Prudential Borrowing as CCC contribution (£300k) as should be funded from revenue. An overall increase of £1.5m to fund the £800k CCC contribution and £700k from other LA's as approved by Cabinet in August 2019	1.3
<b>TOTAL APPROVED / TECHNICAL CHANGES</b>		<b>5.9</b>

### Appendix 3

<b>DIRECTORATE</b>	<b>BASE BUDGET plus 20/21 RESCHEDULING £m</b>	<b>TOTAL APPROVED / TECHNICAL CHANGES £m</b>	<b>TOTAL OVER / UNDER SPEND £m</b>	<b>TOTAL RESCHEDULED EXPENDITURE £m</b>	<b>REVISED ESTIMATED OUTTURN QTR3 20-21 £m</b>
PEOPLE	29.2	1.1	0.2	(8.1)	22.4
PLACE	222.6	19.7	0.1	(33.8)	208.6
<b>TOTAL</b>	<b>251.8</b>	<b>20.8</b>	<b>0.3</b>	<b>(41.9)</b>	<b>231.0</b>

## Appendix 4

### Rescheduling and Accelerated Spend

SCHEME	EXPLANATION	£m
Vehicles	Many of the vehicles that would have been replaced for the fleet replacement budget have now been purchased using grant funding via Highways England EV grant. There are also a number of Cleansing and Amenities vehicles that will not arrive by year end.	(1.8)
Whitley Depot Redevelopment	Delayed start of construction.	(1.5)
Growing Places	A reduction in uptake of the Duplex loans, due to the economic impact of the pandemic on businesses, has led to a decrease in the drawdown of the Growing Places fund in 20/21.	(1.6)
Highways Investment	Accelerated funding is needed to deal with unforeseen deterioration and the subsequent required repairs for 2 sections of the ring road. The Cabinet Member has requested repairs for an extra site and also increased repairs versus planned repairs to another site.	0.3
UK Central & Connectivity - Coventry South Package	The award of the main construction Contract for the A46 Stoneleigh Junction scheme was delayed from the original programme primarily due to the detailed design approval from Highways England (HE) taking longer than originally anticipated. HE approval was necessary as the scheme involves the re-construction of the slip roads on and off the A46, which is part of the Strategic Road Network managed by HE. The Contract was awarded in November 2020 and site mobilisation is underway. The delay in securing the HE technical approval did not hold up preparatory works such as environmental mitigation measures, vegetation removal and utility diversions, all of which progressed during 2020.	(11.3)
The Avenue Bowls Club	Due to the delay in the procurement of the Contractor and contracts delay in general, the project has slipped by at least a further 2 months since the previous forecast was provided. A true position probably won't be known for another month or so yet until the Contractor is on board and therefore this slippage could increase further	(0.9)
Coombe Park new Play Facilities	Planning has not been granted yet, so work is due to start next financial year	(0.2)
Coombe Abbey Car Park Remodelling	Planning has not been granted yet, so work is due to start next financial year	(0.2)

Coventry Station Masterplan	The slippage in Q3 can be attributed to the fact that programme has suffered some delay due to adverse weather. This has impacted on the Phase 1 footbridge lifts, which in turn has had a knock on impact on the adjacent Phase 2 station building works. Payment under the contract is issued against an activity schedule, hence the delay in expenditure. There has been some slippage in project management costs as a result of delays to invoicing and ongoing discussions regarding the level of rates within Network Rail's Asset Protection Agreement for Phase 2 of the project, which will be concluded in Q4. Finally the expenditure profile for the highways element of the works has slipped to reflect the fact that the DLO working area on Warwick Road is constrained by the station building works, which has resulted in reprogramming. These works will be completed in Q4.	(7.9)
Friargate	The Development Manager responsible for delivery of Two Friargate completed the tender exercise during Quarter 3 and the Local Authority has now entered into the contract. The successful tenderer was significantly below budget and forecasts have reduced accordingly. We are advised that the below anticipated tender price is reflective of current market conditions	(1.6)
Basic Need	The reason for the shift in forecast for the education capital programme (basic need), is due to several projects progressing quicker than previously anticipated. At Q2 there were many issues which could have caused major delays, i.e. Impact of Covid-19, winter weather, and programme slip due to struggles obtaining planning permission. Since then planning permission has been received for 2 major projects and appointed contractors which has expediated spend on these projects. Additional mitigations have been put in for potential programme slips to provide some future proofing, for example adding in temporary classrooms on several projects to ensure schools can operate in-case Brexit/Covid-19 has any impact on material availability over the project life.	5.1
City Centre South	Lower than anticipated expenditure on Coventry Point demolition and the Planning Application.	(2.0)
Mixed Recycling Facility	Equity slipped and part of wider review	(0.2)
City of Culture	Profile of cashflow to reflect progress of works across the programme	(0.1)
<b>TOTAL RESCHEDULING</b>		<b>(23.9)</b>

## Appendix 5

### Prudential Indicators

Indicator	per Treasury Management Strategy	As at 31st December 2020
<b>Ratio of Financing Costs to Net Revenue Stream (Indicator 1)</b> , illustrating the affordability of costs such as interest charges to the overall City Council bottom line resource (the amount to be met from government grant and local taxpayers).	14.16%	14.08%
<b>Gross Borrowing should not, except in the short term, exceed the estimated Capital Financing Requirement (CFR) at the end of 3 years (Indicator 2)</b> , illustrating that, over the medium term, net borrowing (borrowing less investments) will only be for capital purposes. The CFR is defined as the Council's underlying need to borrow, after taking account of other resources available to fund the capital programme.	Year 3 estimate / limit of £531.4m	£392.8m Gross borrowing within the limit.
<b>Authorised Limit for External Debt (Indicator 5)</b> , representing the "outer" boundary of the local authority's borrowing. Borrowing at the level of the authorised limit might be affordable in the short term, but would not be in the longer term. It is the forecast maximum borrowing need with some headroom for unexpected movements. This is a statutory limit.	£502.3m	£392.8m is less than the authorised limit.
<b>Operational Boundary for External Debt (Indicator 6)</b> , representing an "early" warning system that the Authorised Limit is being approached. It is not in itself a limit, and actual borrowing could vary around this boundary for short times during the year. It should act as an indicator to ensure the authorised limit is not breached.	£482.3m	£392.8m is less than the operational boundary.
<b>Upper Limit on Fixed Rate Interest Rate Exposures (Indicator 9)</b> , highlighting interest rate exposure risk. The purpose of this indicator is to contain the activity of the treasury function within certain limits, thereby reducing the risk or likelihood of an adverse movement in interest rates or borrowing decisions impacting negatively on the Council's overall financial position.	£439.5m	£300.5m
<b>Upper Limit on Variable Rate Interest Rate Exposures (Indicator 9)</b> , as above highlighting interest rate exposure risk.	£87.9m	-£58.3m
<b>Maturity Structure Limits (Indicator 10)</b> , highlighting the risk arising from the requirement to refinance debt as loans mature: < 12 months 12 months – 24 months 24 months – 5 years 5 years – 10 years 10 years +	0% to 50% 0% to 20% 0% to 30% 0% to 30% 40% to 100%	21% 3% 13% 7% 56%
<b>Investments Longer than 364 Days (Indicator 11)</b> , highlighting the risk that the authority faces from having investments tied up for this duration.	£30m	£0.0m



## Public report

Audit and Procurement Committee

15 March 2021

**Name of Cabinet Member:**

Cabinet Member for Policy and Leadership – Councillor G Duggins

**Director Approving Submission of the report:**

Director of Finance

**Ward(s) affected:**

City Wide

**Title:**

Corporate and COVID-19 Risk Registers

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**Is this a key decision?**

No

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**Executive Summary:**

The purpose of this report is to provide the Audit and Procurement Committee with the outcome of the review of the Corporate Risk Register 2021-22 in Appendix 1 and the COVID-19 Risk Register in Appendix 2. This provides the Audit and Procurement Committee with an overview of the Council's corporate and COVID-19 risk profiles and the controls in place to address these risks.

**Recommendations:**

The Audit and Procurement Committee are requested to:

1. Note the current Corporate Risk Register, indicating that they have satisfied themselves that Corporate Risks are being identified and managed.
2. Note the current COVID-19 Risk Register, indicating that they have satisfied themselves that COVID-19 Risks are being identified and managed.
3. Identify any areas where they require additional information (if any).

**List of Appendices included:**

Appendix 1 – Corporate Risk Register  
Appendix 2 – COVID-19 Risk Register

**Background papers:**

None

**Other useful documents:**

None

**Has it been or will it be considered by Scrutiny?**

No

**Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?**

No

**Will this report go to Council?**

No



**Report title:** Corporate and COVID-19 Risk Registers

**1. Context (or background)**

- 1.1 The Council's Corporate Risk Register and COVID-19 Risk Register are set out in this report within the context of three important factors. Firstly, the ongoing challenge of the resources that are available, secondly the demographic challenges leading to increased demand for services whilst quality must be maintained and thirdly the COVID-19 pandemic which has had a dramatic impact on citizens and local government.
- 1.2 The Audit and Procurement Committee's Terms of Reference requires the Committee to monitor the effective development and operation of risk management within the Council. The Council's Risk Management Policy and Strategy identifies that the Committee will receive risk management reports to assist it to provide independent assurance of the risk management framework and associated control environment.
- 1.3 This report provides the Audit and Procurement Committee with the outcome of the review of the Corporate Risk Register 2021-22 and provides the first opportunity for a review of the COVID-19 Risk Register.
- 1.4 The One Coventry Outcomes that the Council wants to achieve as the city exits the COVID-19 crisis will be considered and if agreed a revised Corporate Risk Register will be brought to the Audit and Procurement Committee in September 2021.

**2. Options considered and recommended proposal**

- 2.1 The Corporate Risk Register at Appendix 1 has been reviewed in consultation with the Senior Management Board and the allocated Risk Manager. It identifies the main risks facing the Council, the planned risk treatment, the progress made to date, where responsibility lies for the Council's response and the risk control status using a traffic light system.
- 2.2 It should be noted that the Corporate Risk Register covers only those risks that are viewed as the most critical for the Council and which are considered at a corporate level. Risk management activity continues throughout the Council dealing with those of a lower level.
- 2.3 The Corporate Risks listed in Appendix 1 can be considered as falling into two separate categories:

*Operational/ Business as Usual* – those risks that could affect the underlying and fundamental operations and structure of the Council

- CR 001 – Finance
- CR 006 – Health and Adult Social Care
- CR 007 – Safeguarding Children and Young People
- CR 014 – Information Governance
- CR 016 – Failure to Comply with Health and Safety Legislation
- CR 021 – Economic Downturn

*Specific/Project* – those risks that could affect specific projects or the major change initiatives to how the Council operates

- CR 002 – Sky Blue Sports and Leisure
- CR 003 – ICT Infrastructure and Change
- CR 005 – Workforce Strategy

CR 019 – Homelessness and Temporary Accommodation  
CR 022 – Children’s Social Services Workforce Stability  
CR 023 – Elections

- 2.4 The Corporate Risks and the control measures in place to address them are more fully described in Appendix 1. Audit and Procurement Committee are asked to review the content of the register and satisfy themselves that the process is operating effectively within the Council as required under the Risk Management Policy and Strategy.
- 2.5 There are some changes to the Corporate Risk Register from the previous report to Members.

Risks added:

CR 021 – Economic Downturn  
CR 022 – Children’s Social Services Workforce Stability  
CR 023 – Elections

Risk with a change of title:

CR 007 – Safeguarding Children and Young People

Risks removed:

CR 011 – Friargate Business District  
CR 013 – West Midland Combined Authority  
CR 017 – City Centre South  
CR 018 – Coventry Station Masterplan  
CR 020 – Brexit

- 2.6 This is the first time that the COVID-19 Risk Register has been considered by the Audit and Procurement Committee. The risks are grouped under the following themes:

Theme 1 – Children Safeguarding and Education  
Theme 2 – Adult Social Care  
Theme 3 – Decision Making and Governance  
Theme 4 – Financial Implications  
Theme 5 – Staff Support and Health and Safety  
Theme 6 – General Data Protection Regulation and Data Protection Act Compliance  
Theme 7 – Support for Those Who Are Homeless or at Risk of Homelessness  
Theme 8 – Public Health  
Theme 9 – Workplace Reopening  
Theme 10 – Culture, Tourism and Sport  
Theme 11 – The Economic Prosperity of the City  
Theme 12 – The Identification of Asymptomatic but Infectious Individuals

### **3. Results of consultation undertaken**

None

### **4. Timetable for implementing this decision**

There is no implementation timetable, this is a monitoring report.

## **5. Comments from the Director of Finance and the Director of Law and Governance**

### **5.1 Financial implications**

There are no financial implications directly associated with the risk registers although the management of the risks is essential to the operation of the Council, the pursuit of its priorities, its financial integrity and the health and safety of citizens and Council staff.

### **5.2 Legal implications**

The maintenance and review of the Corporate Risk Register ensures that the Council meets its statutory obligation under the Accounts and Audit Regulations 2015 to have appropriate measures in place to ensure that risk is appropriately managed.

## **6. Other implications**

### **6.1 How will this contribute to the Council Plan ([www.coventry.gov.uk/councilplan/](http://www.coventry.gov.uk/councilplan/))**

Effective risk management arrangements are an integral component of strategic decision making, service planning and delivery, increasing the likelihood of achieving Corporate aims and objectives.

The measures outlined in the COVID-19 Risk Register will assist the Council to deliver statutory and other services safely.

### **6.2 How is risk being managed?**

The Council has a policy and framework to support risk management arrangements across the organisation as part of its overarching governance processes. This report forms part of that practice.

### **6.3 What is the impact on the organisation?**

Effective risk management arrangements are part of the good governance arrangements which lead to improved decision making and operational practices across the organisation especially during the COVID-19 pandemic.

### **6.4 Equalities / EIA**

None

### **6.5 Implications for (or impact on) climate change and the environment**

No impact

### **6.6 Implications for partner organisations?**

None

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<b>Contributor/ approver name</b>	<b>Title</b>	<b>Service</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
<b>Contributors:</b>				
Michelle Salmon	Governance Services Officer	Law and Governance	25/2/21	25/2/21
David Ashmore	Director of Housing and Transformation	-	15/2/21	22/2/21
Susanna Newing	Director of Human Resources	-	15/2/21	22/2/21
Peter Fahy	Director of Adult Services	-	15/2/21	18/2/21
John Gregg	Director of Children's Services	-	15/2/21	15/2/21
Angie White	Service Manager Occupational Health, Safety and Wellbeing Services	Occupational Health, Safety and Well-being	19/1/21	1/2/21
Andy Williams	Director of Business, Investment and Culture	-	15/2/21	22/2/21
Elizabeth Read	Electoral Services Manager	Law and Governance	28/1/21	29/1/21
Adrian West	Members and Elections Team Manager	Law and Governance	20/1/21	5/2/21
Kirston Nelson	Director of Education and Skills	-	15/2/21	22/2/21
Elizabeth Gaulton	Director of Health and Well- being	-	16/2/21	19/2/21
Richard Moon	Director of Property Services and Development	-	15/2/21	15/2/21
<b>Names of approvers for submission: (officers and members)</b>				
Paul Jennings	Finance Manager	Finance	19/2/21	22/2/21
Julie Newman	Director of Law and Governance	-	4/3/21	4/3/21
Barry Hastie	Director of Finance	-	4/3/21	4/3/21
Councillor G Duggins	Cabinet Member for Policy and Leadership	-	26/2/21	26/2/21

This report is published on the council's website: [www.coventry.gov.uk/councilmeetings](http://www.coventry.gov.uk/councilmeetings)

## Appendix 1 - Coventry City Council – Corporate Risk Register

Risk Ref - 001			Last Reviewed	
Finance			February 2021	
<p><b>Risk Description:</b> If financial and other pressures resulting from the requirement to deliver statutory duties and other services continue, there is a risk that the Council will be unable to achieve a balanced budget in the short and medium term. The risk is exacerbated by uncertainty about the future of local government financing and the legacy impacts of the COVID-19 pandemic.</p>				
Planned Treatment:	Timescale	Progress to date:	Risk Manager	Control Status
<p>Robust arrangements are in place to oversee budget setting, including an assessment of pressures, although COVID-19 has caused some disruption and delay.</p> <p>The budget is updated as new information is known and this analysis is used to inform actions required to balance it.</p> <p>The Provisional Local Government Settlement has brought short-term certainty to some key areas, although the short-term nature of many proposals inevitably shifts uncertainty into future financial years.</p>	February 2022 (Budget Report)	<p>Proposals are in place to deliver a balanced 2021/22 budget subject to final approval at Council.</p> <p>SMB and CLT have identified a transformation programme to help move the Council's medium-term budget towards a balanced position and Members have been briefed.</p> <p>Further work is being undertaken in response to the COVID-19 pandemic. The position for future years is very challenging and fluid with budget gaps rising to £24m by 2023/24, for which plans are not yet in place. The 2021/22 position reflects a broad range of anticipated financial pressures caused by COVID-19. These include but are not restricted to the Business Rates and Council Tax bases and carried forward deficit positions, Children's Social Care, waste disposal, car parking and other income and uncertainty in areas such as Adult Social Care (and its external funding position). These challenges have been recognised within the Pre-Budget Report with the final Budget Report due at Council in February 2021.</p>	Director of Finance	Red
<p>A rigorous structure exists to oversee the budgetary control process and delivery of savings.</p>	Ongoing	<p>A robust budgetary control timeline is being adhered to. Early reporting and the availability of live budgetary control forecasting are available via the Agresso financial system.</p> <p>There are monitoring arrangements to ensure that savings targets have appropriate structures to ensure delivery. The budget is managed on a whole Council basis including (for 2020/21) COVID-19 funding being assessed and applied across all areas affected.</p>	Director of Finance	Red

<p>Issues should be identified early allowing time for corrective action. These are formally reported through the regular Revenue and Capital Monitoring Reports.</p>	<p>Ongoing</p>	<p>The main area of concern through 2020/21 was looked after children (with a gross overspend of £9m) and the costs of COVID-19 (totalling c£34m at quarter 3). Medium term budget plans have taken account of the likely profile of non-COVID-19 ongoing expenditure pressures and they will be monitored closely through 2021/22. COVID-19 costs are likely to be matched by COVID-19 grants within 2020/21 but the pandemic threatens to adversely affect the Council's financial position in 2021/22.</p>	<p>Director of Finance</p>	<p>Red</p>
<p>There is an effective consultation process for proposals outlined in the Pre-Budget Report.</p>	<p>Ongoing</p>	<p>The proposals in the 2021/22 Budget Report have been subject to public consultation over an eight-week period.</p>	<p>Director of Finance</p>	<p>Green</p>

<b>Risk Ref - 002</b>				<b>Last Reviewed</b>	
Sky Blue Sports and Leisure Ltd and Ors and Coventry City Council and Ors				January 2021	
<b>Risk Description:</b> An adverse outcome in respect of legal action by the owners of the football club results in a significant financial and reputational impact to the Council.					
<b>Planned Treatment:</b>	<b>Timescale</b>	<b>Progress to date:</b>		<b>Risk Manager</b>	<b>Control Status</b>
Appropriate arrangements are put in place to defend the legal action being taken against the Council by the owners of Coventry City Football Club.	Ongoing	<p>The Supreme Court upheld the judgement of the Court of Appeal which was to refuse permission for the hearing. The Judicial Review process in the English Courts is exhausted.</p> <p>The owners of Coventry City Football Club have raised a complaint with the European Commission which the City Council has responded to via the Department for Business, Energy and Industrial Strategy. A decision is awaited as to whether the European Commission is minded to investigate the complaint.</p>		Director of Legal and Governance Services	Green

<b>Risk Ref – 003</b>			<b>Last Reviewed</b>	
ICT Infrastructure and Change			January 2021	
<p><b>Risk Description:</b> If the major programme of ongoing developments and implementation of an ICT and Digital strategy is not implemented successfully it would cause the following risks to the Council: (1) additional financial pressures (2) significant disruption to the day to day running of the Council both in the implementation phase as a result of continuing to operate with ageing systems in the meantime and an ongoing basis, (3) does not underpin the Council's transformation programme and associated new ways of working. (4) infrastructure and systems are not resilient to enable business continuity and data security as the Council becomes more heavily reliant on ICT. (5) Moving to a Digital approach to delivering services offers greater opportunity for Cyber-attacks.</p>				
<b>Planned Treatment:</b>	<b>Timescale</b>	<b>Progress to date:</b>	<b>Risk Manager</b>	<b>Control Status</b>
Embed and track actions within the approved Coventry Digital Strategy.	Ongoing - annual review	<p>The delivery of the Council's Digital Strategy is ongoing, with Lead Members driving this agenda. A range of activity is continuing over the key areas of development. These are,</p> <ul style="list-style-type: none"> <li>• Digital Place</li> <li>• Digital Communities</li> <li>• Digital Customer and Inclusion</li> <li>• Digital Workforce</li> </ul> <p>A new city-wide Digital Board has been established, focussing on further growing Coventry's prominence as a Digital place and economy.</p> <p>The Council's Digital First programme meanwhile, is spearheading our digital capability by focussing on working with residents, Members and the workforce to optimise the benefits, effectiveness and efficiencies that digital provides.</p> <p>Examples include, new digital services for residents (Adults and Revenue &amp; Benefits), Members and the Workforce (Teams Rollout, launch of new Staff App) as well as prioritised digital services to support the council's response to COVID-19</p>	Director of Housing and Transformation	Green



<p>To review the Council's provision for ICT Cyber security and the methods employed to protect networks from Cyber-attack. To ensure that any attacks against the Council's ICT network can be defended and impact minimised.</p>	<p>Ongoing</p>	<p>A security audit of the Council's Cloud presence has been completed and there are proactive and ongoing programmes of activity around cyber resilience. The Audit Committee have also maintained oversight of this area. Cyber Resilience is also a fundamental part of the continuing ICT Service plan for 2020/21 and future years, it also forms part of the newly published ICT strategy. During 2020/21 it was planned that the Council would be undertaking a "Cyber Essentials Plus" accreditation, which is developed by the National Cyber Security Centre to provide further assurances. Unfortunately, due to the demands of COVID-19 this has not been possible to complete, and this now forms part of a renewed plan and focus on cyber security.</p> <p>In recent months there have been several high-profile cyber security incidents, and a growing number within the public sector and local government. It is important that the Council continually reviews its cyber security posture considering the increased frequency and sophistication of cyber-attacks. There has also been a significant increase in staff working from home which needs to be factored into cyber security planning. The Council is undertaking audits in this area and will be providing the outcome of this focussed activity to SMB for consideration by the end of QTR 1 of financial year 2021/22.</p>	<p>Director of Housing and Transformation</p>	<p>Amber</p>
<p>To continue to review disaster recovery arrangements both within ICT and with Directorates to ensure that the impact of any disruption can be managed, and any disruption minimised.</p> <p>This feeds into the wider review of Business Continuity arrangements following the outage in May 2017.</p>	<p>Ongoing</p>	<p>Regular updates are provided to Audit Committee on Disaster Recovery provision. Work is in progress to test the provision for each key line of business system. A full review of ICT recovery plans was completed last financial year and is now continually reviewed as part of "business as usual" with monthly "checkpoint" meetings to review any concerns. Regular external audits are carried out to review the arrangements.</p> <p>Further work is planned with the CSW resilience team to ensure that the ICT protocols and inputs to the Council's wider Business Continuity arrangements are robust, understood and operating effectively, especially considering how services have come to rely more fundamentally on ICT &amp; Digital services during the COVID-19 pandemic.</p> <p>During 2020/21 the Council will be relocating its secondary data centre to a new facility. The secondary data centre is a fundamental component of the Council's disaster recovery approach and therefore the project to deliver the relocation will be very carefully planned and managed following the standard ICT change process, to provide assurance on the planning and technical resilience of the project.</p>	<p>Director of Housing and Transformation</p>	<p>Amber</p>

<p>To agree a programme of audit / peer review work to gain assurance around the efficacy of arrangements in place including the Council's core network infrastructure and cyber arrangements.</p>	<p>Ongoing</p>	<p>An independent health check review of the Council's core network infrastructure has been scoped and commissioned following the network outage on 23<sup>rd</sup> May 2017. Immediate remedial actions were taken, and a full network redesign programme has been agreed with SMB. This work will be due for completion during 2021/22 and is part of an ongoing and continuous review of the Council's network infrastructure.</p> <p>A plan of ICT audits has been agreed for 2020- 2023, and this is underway. Regular meetings are held with Internal Audit to ensure the plan meets the ongoing needs.</p>	<p>Director of Housing and Transformation</p>	<p>Green</p>
<p>Develop and periodically review Corporate and Directorate ICT strategies, roadmaps and technology catalogues to ensure technology is kept up to date and maintains a sufficient level of capacity to support increased or change of use.</p>	<p>Ongoing</p>	<p>The Corporate roadmap has been refined; this will be reflected in directorate strategies and be continually reviewed. Individual ICT projects are subject to change management and appropriate project management arrangements.</p> <p>A revised ICT Strategy was approved by Cabinet in October 2019. The Strategy is based on the key principles of "Coventry as a Platform" which seeks to streamline and modernise processes and systems and the "Digital Workforce", ensuring staff have the relevant skills and tools to make the best use of the technologies available. The Strategy is aligned to the One Coventry approach and reflects requirements stemming from:</p> <ul style="list-style-type: none"> <li>• Medium Term Financial Strategy</li> <li>• One Coventry Council Plan</li> <li>• Coventry UK City of Culture 2021</li> <li>• Digital Coventry Strategy for the city</li> </ul> <p>The Strategy also recognises the priority of protecting the Council's technology estate, data and users from cyber-threats through robust and proactive approaches to the Council's cyber security measures.</p>	<p>Director of Housing and Transformation</p>	<p>Green</p>

Risk Ref - 005			Last Reviewed	
Workforce Strategy			January 2021	
<b>Risk Description:</b> If the council does not deliver “The People Plan” key workforce and organisational development objectives will not be met, resulting in the failure of “One Coventry” and the council’s priorities of being globally connected, locally committed and delivering its priorities with fewer resources not being achieved.				
Planned Treatment:	Timescale	Progress to date:	Risk Manager	Control Status
<p>Organisational Development</p> <p>One Coventry values will be established which will enable the Council to have a workforce that is engaged in a supportive culture of learning, well-being, competence and leadership.</p>	One year	<p>The organisational values have now been developed and introduced, although later than intended due to the pandemic. The engagement plan is now being developed to increase knowledge and engagement across the Council.</p> <p>The workforce Equality, Diversity and Inclusion action plan is being implemented.</p> <p>The Council is ensuring organisational compliance with mandatory training, appraisals and inductions.</p> <p>The Council has completed a stakeholder analysis and put in place a diversity of communication methods to ensure timely and effective consultation with all stakeholders. This will be captured in a written plan and monitored for effectiveness.</p>	Director of Human Resources	Amber
<p>Pay, Reward and Recognition</p> <p>The council will have a total reward strategy that attracts, values and retains talent that will support the organisational values and priorities</p>	One year	<p>A pay modeller has been engaged to assist the Council in developing a pay structure in line with best practice, undertake an equality review and help shape the future offer. Discussions have taken place with the Trades Unions, and SMB/CLT. Formal consultation is underway with the Trades Unions, with a view to reaching an agreement.</p>	Director of Human Resources	Amber
<p>Recruitment and Retention</p> <p>The Council will develop flexible recruitment methods which meet the needs of the Council and provides a diverse workforce for the future, that is commercially aware and strives for excellent customer care.</p>	One year	<p>Tribepad, the new recruitment system was introduced in April 2020 and has been successful at increasing the volume of applications and improved management information. Training for managers was initially delayed due to the pandemic as it was amended to an online solution. The next step is to train managers on the equality aspects of the recruitment process and introduce the values into the process.</p>	Director of Human Resources	Amber

<p>Health and Well-being</p> <p>A supportive culture of health and well-being will be established as an essential element of the Council's offer to employees.</p>	<p>One year</p>	<p>Working with Public Health and the Trades Unions, a health and well-being plan is being developed to introduce some creative initiatives to support staff at work. In 2020, the group supported the Thrive accreditation, developed a staff health and wellbeing guide and secured the Chief Executive as a sponsor. The group also oversaw the development of the flexible working framework which resulted from feedback from the staff health and well-being survey. A further survey has just been undertaken.</p> <p>The group meets monthly. The agenda in the last few months has been dominated by COVID-19. However, an employee survey has been undertaken on the impact of COVID-19 which will now influence the strategy, which is in the process of being revised in the light of the pandemic. Interventions include; introduction of Kaido, health and well-being app, physical and mental health workbooks, risk assessments and training.</p> <p>A review with the Trades Unions of 'Promoting Health at Work' policy is underway with a draft policy shared with the trades unions, a toolkit and training are planned</p>	<p>Director of Human Resources</p>	<p>Amber</p>
<p>Workforce Planning and Management Information and Support</p> <p>The Council will have a positive employee relations climate which is supported by effective policies and procedures and management information.</p>	<p>One year</p>	<p>Working in partnership with our Trade Union colleagues, five policies have been reviewed and revised to date. A further five are under active discussion and the remainder are being timetabled. This remains an organisational priority, with a revised consultation agreement in place including revised health and safety meetings.</p>	<p>Director of Human Resources</p>	<p>Amber</p>

Risk Ref - 006			Last Reviewed	
Health and Adult Social Care			February 2021	
<p><b>Risk Description:</b> The organisation is unable to deliver its statutory requirements in respect of the provision of adult social care within the resources available and work in partnership with health to deliver the national expectation of an integrated care system, resulting in significant risks to vulnerable residents, reputational damage and overspends.</p> <p>The impact of COVID-19 has seen costs of activity increase and although met with short term additional funding these costs may be enduring. Ongoing expectations in respect of areas of joint working with health (for example in respect of rapid hospital discharge) will also require a sustainable resourcing solution if they are to continue. Any ongoing long-term demand changes as a result of COVID-19 are not yet known although areas including mental health, carer support and supporting the health system are likely to become higher profile.</p>				
Planned Treatment:	Timescale	Progress to date:	Risk Manager	Control Status
<p>Use of Better Care Fund and Adult Social Care Support Grant.</p> <p>Use of additional monies provided to respond to COVID-19 until March 2021</p> <p>Levying the 3% adult social care precept.</p> <p>Continuing to take a rigorous approach to budget management and financial control in the context of demand facing adult social care and support.</p>	Ongoing	<p>The funding for the Improved Better Care Fund has been rolled into 2020/21 and as yet is not confirmed for 2021/22.</p> <p>Uncertainty remains regarding future grant allocations, beyond 2020/21. The short term COVID-19 grants are being used to support the market with a range of additional cost pressures associated with infection control and staffing. Should the grants stop, this area of activity will be required to reduce accordingly.</p> <p>There has been limited review of Better Care Fund projects since March 2020 as a result of a whole focus on COVID-19, however some of the working practices introduced over this period, e.g. 7-day discharge planning, supports Better Care Fund requirements.</p> <p>Monthly budgetary reviews remain in place to review the position and actions are identified to manage the overall resource envelope.</p> <p>Additional costs associated with COVID-19 are being tracked. This includes one-off costs plus longer-term costs as a result in changing demand.</p>	Director of Adult Services	Amber

	Ongoing	<p>Providers continue to be engaged on an individual basis to understand and risk assess issues that exist that may threaten sustainability.</p> <p>COVID-19 has introduced new risks into the social care market including requirements for PPE, risk of staff being unavailable due to self-isolation requirements. Existing risks including workforce and infection control have also been amplified.</p> <p>A range of support offers have been put in place to support sustainability, including support with PPE and revised payment processes and the newly announced infection control fund.</p> <p>It is not possible to predict the longer-term impacts on the market as a result of COVID-19 at this point, but some providers are reporting lower than usual levels of activity which is impacting on sustainability in the short term.</p> <p>A provider contingency plan is in place that is used in instances of provider failure. Specifically, vulnerabilities are associated with several providers failing in quick succession.</p>	Director of Adult Services	Green
Develop the Coventry and Warwickshire Integrated Care System (ICS) and local arrangements to deliver the Long-Term Plan.	Ongoing	<p>The development of the Coventry and Warwickshire ICS and delivery of the Long-Term Plan is the major NHS led change programme aimed at delivering financially sustainable and quality services across health and social care.</p> <p>NHSE launched a consultation on placing ICS's on a statutory footing, the implications of which are being considered at a place and system level</p> <p>The City Council is a key partner in the progression and delivery of this work through a range of existing and new governance arrangements and is leading on the Population Health and Prevention work stream to help ensure that the maximum benefit for the City Council can be achieved.</p>	Deputy Chief Executive	Amber

		<p>Much of this system development work paused during the early phase of COVID-19 but is now back underway although recognising that the pace of development is significantly impaired by the resources and energy required to keep health and care operating during a pandemic.</p> <p>The ICS maturity and development plan are currently being updated with a view to being subjected to NHSE/I assurance processes in 2021.</p>		
Implement learning and action plans from Safeguarding Adults Reviews (SAR) and other learning reviews commissioned by CSAB	Ongoing	<p>There is on-going work to progress learning from SARs and reviews. For every review undertaken each subgroup of the Boards have a work plan to include assurance on the recommendations.</p> <p>There are no current live SARs or outstanding action plans.</p>	Director of Adult Services	Green
Introduction of a Use of Care Director for the recording of safeguarding adults processes and progress to facilitate better monitoring of cases and capacity to performance monitor.	Ongoing	Care Director is now being used to record safeguarding activity. Performance monitoring is in place.	Director of Adult Services	Green
Responding to hidden harm against vulnerable adults	Ongoing	COVID-19 has resulted in less interaction with people on a one-to-one basis and as a result less input in people's own homes. It is possible that harm has happened that has not come to the attention of the Council or other safeguarding partners. Working practices have been adapted for the COVID-19 environment.	Director of Adult Services	Amber
Awareness raising for all employees regarding signs and indicators of risk for vulnerable adults.	Ongoing	<p>Safeguarding training is part of mandatory training. During the COVID-19, this is by e-learning methods.</p> <p>Training is checked at appraisals and if staff have not completed training, they receive reminder e-mails and are followed up by line managers.</p>	Director of Adult Services	Amber

<p>Page 64</p>		<p>Posters have been disseminated to reinforce messages.</p> <p>Safeguarding Partnerships annual conferences and events to raise awareness across all agencies and promote prevention and protection of vulnerable adults.</p> <p>An enhanced suite of training is in place for practitioners.</p>		
<p>Safeguarding work where there is an immediate risk of harm is prioritised</p>	<p>Ongoing</p>	<p>Continuous robust oversight of potential safeguarding cases continues. Safeguarding messages to community volunteer groups with key signposting. Use of CSAB to provide an overseeing role</p>	<p>Director of Adult Services</p>	<p>Amber</p>



Risk Ref - 007			Last Reviewed	
Safeguarding Children and Young People			January 2021	
<b>Risk Description:</b> A child or young person experiences abuse or neglect leading to significant harm or death and the Council and its statutory partners or commissioned services are deemed to have failed to safeguard or protect.				
Planned Treatment:	Timescale	Progress to date:	Risk Manager	Control Status
Implement learning and action plans from Safeguarding Practice Reviews.	Ongoing	On-going work in this area to progress learning from Safeguarding Practice Reviews and other learning reviews. For every review undertaken and each subgroup of the Boards there is a work plan to include assurance of the recommendations from SPRs and SARs as they are completed.	Director of Children's Services	Amber
Re-invigoration of quality assurance framework around social work cases in all teams within children's services	Ongoing	Quality Assurance activity is in place ensuring strong compliance and a firm baseline for review. Robust performance information developed. New audit tools developed with increased level of audit activity. Children's peer reviews and inspections include a sample audit of cases to inform learning. Other quality activity is underway through the Practice Improvement Forum and workforce development and webinars. Managers are focusing on the quality of practice.  Audits for April 2020 were paused as a result of the COVID-19. Audits have continued from May 2020 onwards.	Director of Children's Services	Green
Ensure Early-help services are effective and the provision of an improved response to need	Ongoing	The Early Help Board is leading the continued implementation of the Family Hub Model and shared ownership of the early help agenda across the whole partnership.  A plan to re-open family hubs and area teams has been implemented all buildings are now COVID-19 compliant and have re-opened to the public.	Director of Children's Services	Green
Develop an improving Children's Services	Ongoing	Identification and early assessment of those children who need immediate protection. Identification of risks and actions taken to protect	Director of Children's Services	Amber

		<p>them are appropriate and effective. Assessment and planning strengthened by use of a risk-management model to support child-focused practice.</p> <p>Assessment and visits will continue and will be in accordance with the measures identified in risk assessments.</p> <p>Ofsted interim visits commenced in September 2020. Children's Service anticipate an Interim Focus visit in February/March 2021. The focused visit will have a broader scope, focus on quality of decision making, fieldwork over 2 days and size of the inspection team increased to also include a school HMI.</p> <p>The Ofsted preparation and planning group oversee and monitor preparations. The Self-Assessment is currently being updated for 2021.</p>		
<p>Awareness raising for all Council employees of signs and indicators of risk to children, young people.</p>	<p>Ongoing</p>	<p>Safeguarding training is part of mandatory training. During the COVID-19 period face to face training has been cancelled and will be undertaken by e learning/virtual learning methods until further notice.</p> <p>Information through training to all staff advising of what to do if concerned about a child or adult at risk of harm or abuse. All staff have been reminded directly by e mail from the Deputy Chief Executive, of the importance of updating their training.</p> <p>Posters were disseminated to reinforce the responsibilities of staff to protect children and young people at risk of abuse.</p> <p>Safeguarding Partnerships annual conferences and events to raise awareness across all agencies and promote prevention and protection of children, young people and vulnerable adults.</p>	<p>Director of Children's Services</p>	<p>Amber</p>

To ensure that the impact of any proposed changes in service delivery specifically consider the risk in relation to safeguarding.	Ongoing	<p>Explicit consideration of safeguarding implications as part of any change process or proposal, e.g. changes to ICT systems.</p> <p>Explicit consideration of risk in relation to safeguarding to form part of decision making on change proposals.</p>	Director of Children's Services	Green
Effective plans in place to manage caseloads	Ongoing	<p>The current COVID-19 pandemic has seen case numbers rise significantly meaning the current establishment no longer provides enough capacity and a review of the workforce model against current activity (Nov-20) has highlighted significant risk with current caseloads and staff retention</p> <p>Additional temporary funding has been agreed to fund additional social worker posts that have been impacted by increases in CIN, CP, LAC to manage current demand.</p>	Director of Children's Services	Red

Risk Ref - 014

Last Reviewed

Information Governance

February 2021

**Risk Description:** Legal challenge made upon the City Council/Chief Executive

If the Council mismanages the large amounts of complex and personal data that it holds on different systems there is an increased risk that it will suffer data loss, misuse, inadvertent release and breach of privacy and be unable to respond to data requests in the required time frame resulting in breaches of legislation, fines and reputational damage.

Planned Treatment:	Timescale	Progress to date:	Risk Manager	Control Status
<ul style="list-style-type: none"> <li>Approved Information Management Strategy and associated programme of work</li> </ul>	December 2021	Meetings of the Information Management Strategy Group (IMSG) are being reconvened with an updated term of reference to maintain corporate oversight of the Information Management Strategy with support from the Information Governance Team.	Director of Law and Governance Services	Amber
<ul style="list-style-type: none"> <li>Refresh the Council wide training programme and ensure that high rates of completion are achieved</li> </ul>	September 2021	Refreshed training modules have been reviewed and are awaiting approval. Measures are in place to ensure increased rates of compliance and further work is planned to improve monitoring.		
<ul style="list-style-type: none"> <li>Ensure that guidance and information about policies, roles and responsibilities is up to date and easily accessible</li> </ul>	December 2021	The Information Governance handbook will be reviewed		
<ul style="list-style-type: none"> <li>IT platforms will be put in place to make the management of information more robust and effective.</li> </ul>	1 March 2021 (FOI)	The Freedom of Information system will be in place shortly. A business case is being prepared for the development of software which will help to control information asset		

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<ul style="list-style-type: none"> <li>• Ensuring data sharing decisions are documented and risks signed off by IAO.</li> <li>• A strategic review of the resources available to the team will be undertaken</li> <li>• Develop and implement revised approach to Information Asset and Information Risk Registers</li> </ul>	<p>Ongoing</p> <p>September 2021</p> <p>Approach to be agreed by May 2021</p>	<p>management and data security incidents.</p> <p>A review of resources is required as a priority to respond to increasing demand in Data Subjects exercising their rights under the GDPR.</p> <p>Needs to commence</p>		
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**Failure to Comply with Health and Safety Legislation**

January 2021

**Risk Description:**

Failure to comply with Health and Safety legislation/practice leading to (a) injury to employees and other parties (b) intervention and prosecution by the HSE and other agencies (c) increase in sickness absence (d) liability claims (e) damage to reputation (f) corporate manslaughter (g) reduction in performance and standards

Planned Treatment:	Timescale	Progress to date:	Risk Manager	Control Status
<p>Corporate Health and Safety Policy and Strategy with roles and responsibilities clearly defined</p> <p>Health and safety consultation and communication with employees</p> <p>Health and safety audit, monitoring and inspection programmes</p> <p>Health and safety risk assessments, mitigation and action plans identifying areas for improvement</p>	<p>Ongoing</p>	<p>Approved Health and Safety Policy statement setting out roles, responsibilities - version July 2019 – 2021.</p> <p>Formal health and safety consultation arrangements through Health and Safety Strategy Group, Joint Safety Forum and Operational Health and Safety committees.</p> <p>Informal health and safety communication through management and at team meetings.</p> <p>Managers Health and Safety Annual Self Audit. Monitoring and inspection at service level by managers. Independent audit, inspection and monitoring by Health and Safety staff to ensure compliance and high performance.</p> <p>Corporate Health &amp; Safety Action Plan – version July 2019 – 2021</p> <p>Directorate/service risk assessments including COVID-19 specific risk management</p> <p>Directorate/service action plans developed from risk assessments, audits, monitoring and inspection of the workplace.</p>	<p>Director of Human Resources</p>	<p>Amber</p>

Health and safety training, toolkits and information dissemination	Ongoing	Risk Assessment toolkit and guidance on key Health & Safety issues is available for managers and employees.  Mandatory Health and Safety training programme  Toolbox talks and awareness campaigns on high profile issues Newsletter – Be Safe, Be Healthy, Be Well	Director of Human Resources	Green
Process and system for recording and monitoring incidents and accidents	Ongoing	The Alcamus incident reporting system is in place. Investigations are carried out as required. Procedures for reporting work related injuries, diseases and dangerous occurrences are in place.	Director of Human Resources	Green
Professional Health and Safety and Occupational Health Service	Ongoing	Team of Occupational Health and Health & Safety staff providing specialist advice and support to the organisation  Health surveillance in line with legislative requirements	Director of Human Resources	Green
Arrangements for statutory / legislative inspections and assessments  Electrical, fire, asbestos and water hygiene	Ongoing	Contracts/procedures are in place to comply with legal assessments/inspections  Independent audit by Health and Safety Team	Director of Human Resources	Green

Risk Ref – 019		Last Reviewed		
Homelessness/Temporary Accommodation		January 2021		
<p><b>Risk Description:</b> If the number of people presenting themselves as homeless or at risk of being homeless continues to rise there is a risk that the Council will be in breach of its statutory duties.</p>				
Planned Treatment:	Timescale	Progress to date:	Risk Manager	Control Status
<p>The Council is actively working towards early prevention of homelessness, an increased and more affordable housing supply as well as reducing demand for temporary accommodation, focussing on:</p> <ul style="list-style-type: none"> <li>• Targeted and universal prevention</li> <li>• Specific housing development projects for temporary and permanent accommodation</li> <li>• Reducing cost and improving quality of existing accommodation</li> <li>• Supporting vulnerable people</li> </ul>	Ongoing	<p>The council has several active projects to increase the supply and quality of temporary accommodation.</p> <p>The rates for existing temporary accommodation have been renegotiated and several new initiatives have reduced expenditure resulting in significant cost reduction. This has resulted in the service forecasting a £2.8 million (excluding COVID-19 related costs) underspend for 2020/21 and a new savings target of £1.5 million for 2021/22.</p> <p>The Council has made progress with key accommodation projects, such as Caradoc Hall which has been occupied as temporary accommodation for families since January 2020.</p> <p>Other projects of this type are also being developed which will allow the Council to exercise greater control over the accommodation including the ongoing purchasing of HMOs for singles, the purchase of 5 large family properties and the Cornerstone and Housing Network agreements.</p> <p>From a prevention perspective, the Council has markedly improved, which has contributed to a decrease in the number of singles and families in Temporary Accommodation. The service has a target to deliver 750 prevention and reliefs in 2020/21 and is on target to achieve 1,000+</p>	Director of Housing and Transformation	Amber
		<p>The Council has launched a Rent Guarantee scheme so homeless households can access affordable private rented properties in the city with 31 families having been accommodated to date.</p>	Director of Housing and Transformation	Amber



The Housing & Homelessness strategy ensures the delivery of projects to specifically reduce demand “upstream”, thereby reducing the numbers of homeless clients requiring different forms of statutory service.

Cabinet agreed a Rough Sleeping Strategy in December 2019, which is complemented by a Rough Sleeper Outreach Team and ongoing participation in the Housing First programme.

At a National level, a January 2021 report from National Audit Office on Rough Sleeping set out for the government to review the current rough sleeping strategy, in light of the impact of COVID-19 and the greater demand on local authorities.

### **COVID-19**

The impact of COVID-19 has added greater risk and complexity and is currently a changing situation.

The Public Health risk is being mitigated through the move to fully self-contained accommodation and support to individuals through the ‘Everyone In’ initiative, which has seen over 300 people being housed as at January 2021.

Coventry has secured funding through MHCLG to provide different accommodation options including short term hotel accommodation, additional supported accommodation beds and 25 1-bed flats specifically for rough sleepers.

Although demand on the Housing service initially reduced during the pandemic, the number of households requiring support has reached pre-COVID-19 demand levels. However, it is anticipated that a sharp increase in demand for services will be forthcoming over the coming months. This is being monitored closely and the above property and funding mitigations are required in order to effectively manage in the medium term.

The linked recommissioning exercise has been delivered on time and the new contracts went live, as planned, in April 2020. The outcomes are being monitored in line with the contractual responsibilities

Director of Housing and Transformation



Risk Ref - 021	Last Reviewed			
<b>Economic Downturn</b>			January 2021	
<p><b>Risk Description:</b> There is a risk that the combined impacts of COVID-19, combined with exiting the EU Single Market and Customs Union and the non-tariff trade barriers presented by the UK EU Trade &amp; Co-operation Agreement (24/12/2020), will have an adverse impact on businesses resulting in downsizing or closure and redundancies, high long term unemployment (including among younger people), a decrease in citizens health and wellbeing, an increase in demand for Council services combined with a reduction in resources available to it, through a decrease in the business rates and the tax base. This will have a significant impact on the Council being able to fulfil its statutory responsibilities.</p>				
Planned Treatment:	Timescale	Progress to date:	Risk Manager	Control Status
<p><b>End of Transition Agreement</b></p> <p>The Council has worked to ensure that all reasonable steps are in place for the end of the transition period (31/12/2020).</p> <p>A Brexit Preparedness Group led by a Director has been working to ensure a robust and coordinated response.</p> <p>CCC's Economic Development Service is working collaboratively with local business support partners to ensure businesses have access to the necessary information and guidance on steps they need to take to adjust to new trading regulations with the EU from 1/1/2021.</p> <p><b>Capital Projects</b></p> <p>The Council is investing in the city. Spending is projected to be £271.8m and includes major scheme expenditure which ranges from investment in the A46 Link</p>	<p>31 December 2021 (depending on how long COVID-19 related restrictions to business and social activities remain in place)</p> <p>Ongoing</p>	<p><b>End of Transition Agreement</b></p> <p>Necessary measures are being implemented within the Council and it is advising businesses on the actions to take, in light of the UK-EU trading regulations which commenced at the beginning of 2021. Many actions are ongoing and include:</p> <ul style="list-style-type: none"> <li>• Updating of the Council's Business Continuity Plans</li> <li>• Ongoing liaison with key suppliers to ensure contingency planning, particularly around possible delays to delivery of goods at ports</li> <li>• Promoting the EU settlement scheme with social care providers to support continuity of workforce</li> <li>• Contributing to the work of the Local Resilience Forum in ensuring regional resilience planning</li> <li>• Working with the Coventry &amp; Warwickshire Local Enterprise Partnership Growth Hub, the Chamber of Commerce and local businesses to support businesses to take the necessary actions to ensure they comply with new regulations of different EU Member States</li> <li>• Working with WMCA to support management of and regional scale risks (e.g. possible impacts on automotive supply chains).</li> </ul> <p><b>Capital projects to help stimulate economy</b></p> <ul style="list-style-type: none"> <li>• Construction of UKBIC and installation of equipment (Innovate UK and WMCA funds) progressing and on track to be complete by March 2021.</li> </ul>	<p>Director of Business, Investment and Culture</p>	<p>Red</p>

<p>Road, Coventry Station Masterplan, Whitley South infrastructure, City Centre South, Two Friargate, Secondary Schools expansion and the UK Battery Industrialisation Centre</p>		<ul style="list-style-type: none"> <li>• Coventry Station Extension progressing, which includes delivery of second station building, new car park, footbridge and lift/stairs - on track to be completed by Spring 2021.</li> <li>• CW LEP and WMCA funded City Centre Public Realm works on track for completion for start of UK City of Culture in May 2021.</li> <li>• The Council has agreed £17m funding to supplement £51.2m WMCA grant to deliver the Two Friargate commercial office scheme. Two Friargate started on site during Autumn 2020.</li> <li>• Public consultation to inform the City Centre South planning application was held in June 2020. The planning application was submitted to the local planning authority during Autumn 2020.</li> </ul>		
<p><b><u>Support to business in the city</u></b></p> <p>Collaboration with local business support partners (fronted by CWLEP Growth Hub) to develop an evidence base and lobby government on local business needs.</p> <p>Business Support Services and Programmes (CW Business Support, Green Business, Innovation and Skills 4 Growth – all delivered with local business support partners)</p> <p>Grants and loans including the Investment Fund grant</p> <p>Inward Investment Service</p> <p>Supply chains and networks</p> <p>Coventry City Council Employer Hub</p>	<p>Ongoing</p>	<p><b><u>Support to business in the city</u></b></p> <ul style="list-style-type: none"> <li>• Monthly Coventry City Council Business &amp; Economy Briefings and CWLEP Smart Region reports, detailing key local and macro-economic and business trends, actions being taken by the Council and partners to address these, and identifying areas where further public funds are required to address business and economic needs.</li> <li>• Coventry City Council has awarded over £56m in COVID-19 Government grants to over 4,700 businesses since April 2020, and 6,750 businesses have securing £262m in Government loans.</li> <li>• Coventry City Council’s major SME support programmes continue to use flexibilities to enable the delivery of its business support services, particularly through video conferencing 1:1 support and most notably webinars, which continue to receive significantly higher levels of take-up than physical seminars held prior to March 2020.</li> </ul>		

		<ul style="list-style-type: none"><li>• Coventry City Council's Employer Hub is working with Jobcentre Plus' Rapid Response Team to support SMEs that are considering making redundancies. It has established the Youth Hub as part of the Ambition Coventry programme to provide in-depth support to young people being made redundant. Working with CWLEP Growth Hub, Warwickshire County Council, CW Chamber of Commerce and Federation of Small Businesses, it also set up CW Employment Solutions, which is a portal providing local businesses with support with recruitment and help match local people to new vacancies.</li></ul>		
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Risk Ref - 022				Last Reviewed	
Children's Social Services Workforce Stability				January 2021	
<b>Risk Description:</b> If Children's Services fails to develop its workforce to reflect the way it needs to operate; it will result in social worker staff leaving leading to a deterioration in the level of service provided to children and young people.					
Planned Treatment:	Timescale	Progress to date:	Risk Manager	Control Status	
<p>Workforce planning; resource planning the Council's workforce needs for now and in the future.</p> <p>Supporting; refreshing the Council's employee engagement and ensure its employment practices are fit for purpose.</p> <p>Enabling: ensure the workforce has access to the tools to work smart and efficiently (technology/location/workstyle)</p> <p>Transforming: put in place an effective leadership &amp; management development programme and a pay and reward framework that is effective and fit for purpose.</p> <p>Recruitment and retention strategies in place to retain experienced social workers</p>	Ongoing	<p>A robust Workforce Development Board is in place to monitor progress against the Workforce Development Strategy 2020/21. The Strategy will be updated in April 2021.</p> <p>The number of social work vacancies is currently high and is a concern. The COVID-19 pandemic has had an impact on this and made it difficult to recruit experienced social workers during this period. This has led to an increased use of agency staff and increased financial impact.</p> <p>There is difficulty to recruit agency social workers due to insufficient experienced social workers in the region. A shortage of social workers has led to higher caseloads and higher demand of work in the system.</p> <p>The current COVID-19 pandemic has seen case numbers rise significantly meaning the current establishment no longer provides enough capacity and a review of the workforce model against current activity (Nov-20) has highlighted significant risk with current caseloads and staff retention.</p> <p>Additional temporary funding has been agreed to fund additional social worker posts that have been impacted by increases in CIN, CP, LAC.</p> <p>Recruitment and retention initiatives are being explored to increase the number of experienced social workers appointed and to ensure that the offer for social workers supports and improves retention.</p> <p>The progression framework has been reviewed to further and strengthen the retention of social workers.</p>	Director of Children's Services	Red	

		<p>The Social Worker Academy provides support to newly qualified social workers into the service. This has seen the recruitment of 54 Newly Qualified Social Workers into the Academy since July 2018. In September 2020, a new cohort of 12 NQSW's commenced. The service has also agreed to fund additional Academy team for a temporary period to recruit more NQSW's to existing vacancies and reduce reliance on agency staff.</p> <p>A Comprehensive training offer is in place for Children's Services staff. A number of training courses continued to be delivered virtually as a result of the COVID-19 pandemic.</p>		
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Risk Ref - 023				Last Reviewed	
Elections				January 2021	
<b>Risk Description:</b> A loss of key staff or failure to comply with legislative requirements may result in a failure to deliver elections and increase the chance of an election petition being lodged, resulting in the need to rerun the election at significant cost and with severe reputational damage.					
Planned Treatment:	Timescale	Progress to date:	Risk Manager	Control Status	
The Council has detailed project plans, which are monitored by a high-level Project Board, Chaired by the Chief Executive.	Ongoing	This risk treatment is in place	Chief Executive	Amber	
Service contingency plans are in place. These include plans for the count venue, polling stations and ICT.	Ongoing	This risk treatment is in place			
The Council has experienced and trained staff who understand rules and procedures. Team leaders have received training delivered by the Association of Electoral Administrators.		This risk treatment is in place			
The Council follows detailed guidance provided by the Electoral Commission.		This risk treatment is in place			
The Council senior leadership team is gaining greater exposure and understanding of elections in order that there is greater resilience and the Council is less reliant on single individuals.		Senior officers are undergoing training for Returning Officers and verification and count training			
The Elections Service is receiving greater support from the wider Governance function to assist at the busiest times. For example, when elections need to be organised at short notice.		This risk treatment is in place			



## Appendix 2 - Organisational risk on delivery of statutory functions in responding to COVID-19

Likelihood is scored on a scale of 1 to 5 with 5 being high.

Impact is scored on a scale of 1 to 5 with 5 being high.

You then multiply the likelihood score by the impact score and arrive at a total score with the highest being 25.

Traffic light system, anything above 15 is red, 5 to 14 amber and 1 to 4 green.

### Theme 1 - Children Safeguarding and Education

No	Specific risk description	Impact	Inherent risk score	Measures to mitigate risk	Residual risk score	Risk owner	Risk Score
1	The lock down and Tier 3/4 restrictions has led to high stress and limited support services within family environments resulting in an increase in the likelihood of domestic violence, child abuse, neglect, exploitation, psychological distress and negative impacts on development, as well as financial hardship and housing issues which impact on basic care needs of children.  Abusive parents and other adults have more	Risk of children suffering significant harm with reduced ability to respond and protect.  Escalation in risk and harm leads to an increase in court applications to seek to protect those at highest risk, particularly as attempts to work with families in a formal pre-proceedings process are hampered, not least by the inability of parents to access independent legal	Likelihood  5  Impact  5	Key child protection partners to prioritise Child Protection activity.  Children's services responds to those considered high risk (reds) as a priority.  Manager to support oversight of higher risk cases to ensure risks are managed.  Children's Service during lock down reviewed all cases where formal pre proceedings were due to start or are ongoing to	Likelihood  4  Impact  5	Director of Children's Services	20

	<p>opportunity to abuse children as the level of support and oversight is reduced, therefore abusers have more opportunity and victims have less safe space to disclose.</p>	<p>advice to support through the PLO process.</p> <p>Risk of consequent criticism in the Court arena for any delays, or inactivity.</p> <p>Hidden harm in the city means some children are at risk of harm and not heard.</p> <p>The demand means the level of support and intervention is not delivered to the standard required which creates further risk for the child, service and council.</p> <p>Greater demand for services including the need for closer contact with vulnerable people at a time when resources are stretched.</p> <p>Potential for complaints and litigation.</p>		<p>ensure that risks are monitored and assessed and responded to as appropriate.</p> <p>MASH prioritised and safeguarding messages to volunteer groups that are in the community with key signposting.</p> <p>Prioritise these children being in school, with children of key workers.</p>			
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		A loss of reputation to the Council.					
2	As young people are less engaged in community activities, or wider groups and services, there are concerns they are becoming more isolated, they are likely to spend more time on line with the consequence that they can come into contact with potential abusers / exploiters also with more time on their hands, who have a desire to try and exploit them or accessing child sexual abuse on line as they have more opportunity.	<p>Increased likelihood of child protection threats such as child sexual exploitation.</p> <p>Increased likelihood of child sexual abuse images being accessed/required putting more children at risk of harm and exploitation.</p> <p>Children have no safe space to go and no safe adults to turn to therefore abuse remains hidden and secrets maintained.</p>	<p>Likelihood</p> <p>5</p> <p>Impact</p> <p>5</p>	<p>Identify those children who are at most at risk.</p> <p>Reiterate child protection messages to most vulnerable children.</p> <p>Get messages out that children's services are available to support.</p> <p>Ensure children are seen and not just remotely – face to face in a safe space is vital.</p> <p>Children's services to respond to referrals in a timely manner.</p>	<p>Likelihood</p> <p>4</p> <p>Impact</p> <p>5</p>	Director of Children's Services	20
3	Work with expectant parents of unborn babies referred to Children's Services due to concerns relating to risk of abuse or neglect to the child once born, cannot be fully progressed, due to restrictions in social contact and the ability to progress assessments. Impacted upon by the inability of parents to access independent legal	<p>Potential increase in the number of court applications having to be made, without any pre-birth assessments being completed, due to the need to ensure new-borns are protected.</p> <p>Increase in relinquished babies.</p>	<p>Likelihood</p> <p>5</p> <p>Impact</p> <p>5</p>	<p>All outstanding pre-proceedings cases being reviewed to identify whether risks remain manageable in the community.</p> <p>Continue to try to work with expectant parents to complete necessary assessments to determine the level of risk.</p>	<p>Likelihood</p> <p>3</p> <p>Impact</p> <p>5</p>	Director of Children's Services	15

	advice to support through the PLO process.	<p>Potential increase in terminations which will leave a lasting impact on adult's mental health and wellbeing</p> <p>Fears of working with professionals due to increased impact of COVID-19.</p> <p>Increase in the use of Parent/Child assessment placements as less community assessments take place due to reduced support from partner agencies.</p>		Ensure risk assessment is completed at birth to determine if court proceedings are necessary, or whether the risk, and if so how, can be managed in the community.			
4	A reduction in both social work by the Council and the activity of other agencies plus the closure of schools resulted in there being fewer opportunities for disclosure to be made about safeguarding issues by children. It is possible that interventions that are required are not being made resulting in harm to vulnerable	<p>Children's care needs are not being met and some children have suffered, are suffering and continue to suffer abuse.</p> <p>Children may suffer distress, exposure to abuse, with long term consequences for the child's resilience, ability to learn, safety and health.</p>	<p>Likelihood</p> <p>5</p> <p>Impact</p> <p>5</p>	Schools across the City have identified children they deem to be vulnerable and have put monitoring systems in place, proportional to the risk. Strategies include daily 'phone calls, door-step visits and escalation to the police and social care for safe and well checks.	<p>Likelihood</p> <p>4</p> <p>Impact</p> <p>5</p>	<p>Director of Education &amp; Skills</p> <p>Director of Children's Services</p>	20

	<p>children. Schools closed again as a result of the national lockdown.</p> <p>Children's service has seen an increase in referrals, more demand and more complex work as situations have become known at the point of crisis, immediate harm resulting in more immediate action rather than early notification of harm where the crisis could have been prevented.</p>	<p>Children will be more likely to be suffering Adverse Childhood Experiences which can have a long-term impact including into adulthood.</p> <p>As hidden harm becomes more known the impact of this on demand, caseloads and work-related stress is high and this will impact on responding in a timely manner.</p> <p>Needs are greater in the medium and long term.</p> <p>Complaints and litigation.</p>		<p>Many children were still hidden from professional support and contact and as these children start to become known to the service, immediate safeguarding action may be needed.</p> <p>Referrals will be managed in a timely manner and children safeguarded based on the level of risks suffered/posed to them.</p>			
5	<p>If Children's Services staff are not properly equipped with the correct PPE, families may reduce their level of cooperation with care and statutory social work professionals and refuse them entry to their home resulting in</p>	<p>Social workers and other professionals are less able to have face to face contact with children. Visits are undertaken remotely or on the doorstep using social distancing.</p>	<p>Likelihood 5</p> <p>Impact 5</p>	<p>Identify which areas of statutory practice should be prioritised.</p> <p>PPE guidance in place and sourcing activity on going.</p>	<p>Likelihood 2</p> <p>Impact 3</p>	<p>Director of Children's Services</p>	6

	<p>professionals being less able to support children including identifying factors which would concern them.</p> <p>If children or families have COVID-19 diagnosis or symptoms, then staff require appropriate PPE to enter the house to take necessary safeguarding actions. Consequently, visits may need to be undertaken remotely, or on the doorstep adhering to social distancing.</p>	<p>Social workers risk assessments are less well informed.</p> <p>An increased risk of harm coming to the child.</p> <p>Potential increase in the number of court applications seeking protective orders to remove children.</p> <p>Placement availability for these children is becoming more limited, resulting in the need to use costly external placements.</p>		<p>Face coverings are now worn in public areas such as receptions and family hubs.</p>			
6	<p>Schools are not COVID-19 secure for children and staff to attend increasing the risk of transmitting Covid-19 infection within the school community and wider.</p>	<p>Increased transmission risk of COVID-19 infection</p>	<p>Likelihood 5</p> <p>Impact 5</p>	<p>Prior to Autumn term opening there was a strong partnership approach to ensuring that schools were COVID-19 secure. This included: risk assessments, assurance visits, stringent hygiene measures, social distancing, face coverings, ventilation, effective use of PPE,</p>	<p>Likelihood 2</p> <p>Impact 5</p>	<p>Director of Education &amp; Skills</p>	10

				virtual meetings between teaching staff, robust Equality Impact Assessments and VERAs and strong collaboration (schools and the Local Authority – Education and Public Health and Trade Unions). This is a continuous process with robust and consistent reviews and on-going learning.			
7	Parents lack confidence in school COVID-19 arrangements and do not send their children to school and do not effectively educate their children at home.	Impacts on the development of children including academic achievement, education progression and emotional and mental health well-being.	Likelihood 4 Impact 4	In addition to the actions in risk 7, schools and the local authority (Education and Public Health) have put in place the following: Effective personalised communication about on-going approaches and processes (including where there are changes to government guidance and national context); and effective communication, assurance and effective	Likelihood 1 Impact 4	Director of Education & Skills	4

				action where children have COVID-19 symptoms and are tested positive.			
8	The face-to-face education of children is disrupted by them being not being in school due to self-isolation and not being able to benefit sufficiently in remote learning (due to variances in the school offer, digital poverty and support they can receive in the day at home).	<p>Impacts on the development of children including academic achievement, education progression and emotional and mental health well-being.</p> <p>Disadvantaged groups are likely to be disproportionately affected and the educational achievement gap will widen potentially reducing opportunities in adulthood including Further Education, Higher Education and employment.</p>	<p>Likelihood 5</p> <p>Impact 5</p>	<p>Robust approach to jointly agreeing which pupils have been in close contact with a positive case, rather than automatically sending home a whole class/year group.</p> <p>Schools have learnt from previous lockdowns and remote learning is more embedded (note this is more the case in secondaries compared to primaries).</p> <p>Shared learning amongst schools.</p> <p>Focused support for transition into adulthood, including skills development and</p>	<p>Likelihood 4</p> <p>Impact 4</p>	Director of Education & Skills	16



		<p>Emotional mental health and well-being: Children and young people experience heightened anxiety due to the impact of the virus; experienced loss or fear of loss; experienced a heightened level of poverty; constricted play and creativity opportunities; reduced emotional resilience and self-regulation.</p>		<p>preparation for employment. Note, digital poverty remains a significant issue.</p> <p>School based strategies are in place to monitor the emotional well-being of children and young people out of school.</p> <p>Wider agency support (education, health and social care) to ensure reach of vulnerable children.</p> <p>Virtual access to therapy services.</p> <p>Promotion of dimensions and self-help tools.</p> <p>City-wide CPD training offer for staff to secure skills to understand and support a breadth of children's anxiety including bereavement.</p>			
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				<p>Transition planning to engage children virtually and secure relationship closure (goodbye and celebration) at phase end.</p> <p>Schools to continue to focus on a recovery curriculum that has a strong emphasis on emotional health and well-being.</p> <p>Implementation of wellbeing programmes and mentoring support for vulnerable pupils</p>			
9	Challenges with the ability of schools to stay fully open or open at all, due to number of staff self-isolating.	Impacts on the development of children including academic achievement, education progression and emotional and mental health well-being.	<p>Likelihood 4</p> <p>Impact 5</p>	<p>Robust approach to jointly agreeing which pupils have been in close contact with a positive case, rather than automatically sending home a whole class/year group.</p> <p>Schools are working hard and creatively to stay open, but face challenges around</p>	<p>Likelihood 3</p> <p>Impact 5</p>	Director of Education & Skills	15

				budgets for supply teachers.			
10	The financial viability of schools is challenged as a result of additional COVID-19 expenditure (e.g. supply teaching).	If the situation continues without additional government support, financial implications for schools will impact on staffing numbers, the way schools are organised and on pupil experience.	Likelihood 4 Impact 4	Support to schools regarding school finances.  Making the case to government regarding additional COVID-19 funding.	Likelihood 3 Impact 4	Director of Education & Skills	12

Theme 2 – Adult Social Care							
No	Specific risk description	Impact	Inherent risk score	Measures to mitigate risk	Residual risk score	Risk owner	Risk Score
11	<p>As the pandemic continues there is likely to be an increase in demand for services. People continue to be subject to a pressurised environment and there may be relationship breakdown, domestic violence, neglect, exploitation, psychological distress with care and support arrangements coming under significant pressure.</p> <p>The ability to meet this demand could be amplified by a reducing workforce as a result of: 1) points based immigration system 2) increasing numbers of economically active people being advised to shield and 3) care seen as a 'risky' sector to work in 4) fatigue and increased absence within the workforce.</p>	<p>Increased levels of harm to people with care and support needs.</p> <p>Greater demand for care and support services when resources are stretched.</p> <p>Impacts due to increased demand on a range of support services in the city whilst they may be operating at reduced capacity.</p>	<p>Likelihood</p> <p>5</p> <p>Impact</p> <p>5</p>	<p>Reactivation of Care Act easements if required.</p> <p>Safeguarding work where those in immediate risk of harm are prioritised and safeguarding messages to volunteer groups that are in the community with key signposting.</p> <p>Use of CSAB to have an overseeing role of safeguarding risk at a system level.</p> <p>Recruitment support offer into the social care market to reduce costs of recruiting and improve levels of success.</p> <p>City Council Health and well-being offer supplemented by the Psychological Support offer via CWPT.</p>	<p>Likelihood</p> <p>5</p> <p>Impact</p> <p>4</p>	Director of Adult Services	20

12	The impact of COVID-19 has resulted in changes to how care has been delivered. Family members are being more heavily relied upon as access has become more difficult and some areas of delivery remain at reduced capacity. This will result in an increase in demand on Council services as some family care arrangements breakdown and vulnerable citizens become less able.	<p>Some vulnerable people may not have their needs met and become less able.</p> <p>Some vulnerable people may suffer physical and mental harm.</p> <p>Complaints and litigation.</p> <p>A loss of reputation for the Council.</p>	<p>Likelihood</p> <p>5</p> <p>Impact</p> <p>5</p>	<p>Those assessed as most vulnerable will be prioritised.</p> <p>Work with the third sector to increase the wider service capacity where possible whilst recognising this sector is also under pressure with limited resources.</p> <p>An enhanced carer support offer has been put in place through Heart of England Carers Trust.</p>	<p>Likelihood</p> <p>5</p> <p>Impact</p> <p>4</p>	Director of Adults Services	20
13	If employees of direct payment recipients must self-isolate or become ill, then the recipient may not receive the care that they require and instead they may have to access care agencies to obtain support.	<p>Continuity of care disrupted.</p> <p>Resultant impact on capacity of agencies to deliver the same or accept new referrals.</p>	<p>Likelihood</p> <p>4</p> <p>Impact</p> <p>4</p>	<p>The Council can arrange replacement care if required.</p> <p>Supporting PAs to access PPE and infection control training where possible.</p> <p>Supporting PAs to access lateral flow tests</p>	<p>Likelihood</p> <p>4</p> <p>Impact</p> <p>3</p>	Director of Adults Services	12
14	If the Council does not adequately support care homes, home support providers and housing with care/supported living there	Increased levels of physical and mental harm to people with care and support needs.	<p>Likelihood</p> <p>4</p> <p>Impact</p>	Provide support to care homes in good infection control practice.	<p>Likelihood</p> <p>3</p> <p>Impact</p>	Director of Adults Services	12

	<p>is a risk that there will be an avoidable increase in COVID-19 infections with subsequent impacts on residents, families, staff and the health service.</p> <p>Additional support has been provided to the sector since April 2020 totalling approximately £8m (10% of total social care spend in the provider market). This resource is only in place until 31 March 2021.</p>	<p>Increased levels of physical and mental harm to staff as they are exposed to the virus and come under increased pressure.</p> <p>Health service partners will experience greater demand for their services and become increasingly stretched.</p> <p>Complaints from service users and their families with the possibility of litigation.</p> <p>A loss of reputation for the care sector and the Council.</p> <p>Inability to meet care and support requirements for the population of the City.</p>	<p>5</p>	<p>Promotion of the PPE portal with Council stocks as a backup if the PPE portal is not enough.</p> <p>Promotion and support for testing whilst recognising that this is not within the control of the Council.</p> <p>Work with care homes where cases, clusters and outbreaks are identified</p> <p>Issue relevant and timely advice on visiting</p>	<p>4</p>		
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Theme 3 – Decision Making and Governance							
No	Specific risk description	Impact	Inherent risk score	Measures to mitigate risk	Residual risk score	Risk owner	Risk Score
15	A decisive response to the COVID-19 pandemic requires that decisions are made at speed, without complete information and often subject to complex, conflicting guidance, with a consequence that they may have unintended impacts and be challenged later.	<p>Ability to consider long term impacts or alternative options is reduced.</p> <p>Access to comprehensive information and assessments is reduced.</p> <p>Decisions may be challenged after the outbreak</p> <p>An increase in complaints and litigation</p>	<p>Likelihood</p> <p>3</p> <p>Impact</p> <p>5</p>	In the event of the need for emergency decisions clear processes are in place for Member oversight and auditable robust decision-making processes.	<p>Likelihood</p> <p>3</p> <p>Impact</p> <p>4</p>	Director of Law & Governance	12
16	As the Council continues to function in the COVID-19 pandemic Officers will have to exercise their functions in a manner that is different to their normal ways of working. This may result in challenges to the ways of working, the decisions taken and claims that the Officers acted or made decisions in	<p>Difficult decisions made may have consequences of significant harm to individuals or damage to livelihoods or property.</p> <p>This places Officers and the organisation at risk of future claims and challenges.</p>	<p>Likelihood</p> <p>5</p> <p>Impact</p> <p>5</p>	<p>Auditable record of actions and reasons collated by the resilience team at strategic and tactical cells.</p> <p>Officials Indemnity insurance.</p> <p>The Council will ensure that risk assessments are up to date and will continue to reinforce</p>	<p>Likelihood</p> <p>4</p> <p>Impact</p> <p>4</p>	Director of Law & Governance	16

	a negligent or illegitimate manner.	<p>Litigation and corporate manslaughter.</p> <p>As more staff get used to living in a COVID-19 environment there is greater need to ensure that they are not complacent and continue to social distance and wear PPE.</p>		safety messages and behavioural expectations.			
17	<p>If the power given to Councils to hold decision-making meetings on-line and remotely during the COVID-19 crisis, enabled by the Remote Meetings Regulations made under the Coronavirus Act 2020 is not extended beyond 7 May 2021 the decision making of elected Members will be hindered resulting in the public having less confidence in the decisions made.</p> <p>The Secretary of State has said that that whilst accepting that the provision</p>	<p>The decision making of elected Members is hindered</p> <p>A loss of confidence in local democracy and harm to the reputation of the Council.</p> <p>Fewer members of the public engaging in meetings.</p> <p>A lack of transparency may result in the public being less willing to comply with decisions being taken</p>	<p>Likelihood</p> <p>5</p> <p>Impact</p> <p>5</p>	<p>Lobbying on behalf of Local Government by the Local Government Association</p> <p>The Association of Democratic Services Officers and Lawyers in Local Government are seeking a declaration from the courts that the pre-existing legislation governing local authority meetings enables them to be held remotely.</p>	<p>Likelihood</p> <p>3</p> <p>Impact</p> <p>5</p>	Director of Law & Governance	15



	has been successful, he has no plans to extend the date as it requires primary legislation and there is no vehicle to do that in time for May.	Elected Members, officers and members of the public health is put at risk						
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Theme 4 – Financial implications							
No	Specific risk description		Inherent risk score	Measures to mitigate risk	Residual risk score	Risk owner	Risk Score
18	Due to the severe financial challenges there is a risk that the Council will be unable to deliver a balanced budget at the end of the current financial year and will have to issue a Section 114 notice	<p>Intervention from national government who would take financial decisions.</p> <p>A loss of local control over what services can be supported.</p> <p>Funds could only be spent under statute to safeguard vulnerable residents or to meet existing contractual obligations.</p> <p>The Council suffers reputational damage.</p>	<p>Likelihood</p> <p>4</p> <p>Impact</p> <p>5</p>	<p>A robust budgetary control timeline is being adhered to, driven by formal reporting deadlines and specific detailed budgetary control analysis and action where required.</p> <p>Close and detailed tracking of COVID-19 related cost and income pressures to inform monthly returns to government to highlight the extent of the pressures.</p> <p>Local cost control measures to be stepped up.</p> <p>Identification of potential flexibility in one-off sources of funding including reserves to manage the position in the short term.</p>	<p>Likelihood</p> <p>1</p> <p>Impact</p> <p>5</p>	Director of Finance	5
19	In the medium term, there is a risk that the Council will not be able to balance its	Increased volatility of funding.	<p>Likelihood</p> <p>5</p>	Identify flexibility in existing budgets and undertake technical	<p>Likelihood</p> <p>3</p>	Director of Finance	15

	<p>budget because of increased pressure on all sources of funding, including from UK Government, locally raised taxes and business rates as well as commercial income, at the same time as demand for services is increasing, resulting in difficult decisions having to be made about which services to support.</p>	<p>Late announcements about funding make it difficult to plan, consult and report within required timeframes.</p> <p>Difficult decisions must be taken by senior officers and Members.</p> <p>Having to make decisions quickly and in the short term, makes it more difficult for the Council to obtain value for money.</p>	<p>Impact</p> <p>5</p>	<p>analysis to identify alternative options to alleviate budgetary pressure.</p> <p>Identify service-based savings options and support the work to produce a medium-term programme of transformation to ensure future sustainability.</p> <p>Lobby UK Government through SOLACE and the Treasurers Society</p> <p>Assist in the economic recovery of the local economy to try to safeguard local income flows.</p>	<p>Impact</p> <p>5</p>		
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Theme 5 – Staff Support and Health and Safety							
No	Specific risk description	Impact	Inherent risk score	Measures to mitigate risk	Residual risk score	Risk owner	Risk Score
20	As staff are required to return to work outside of the home the COVID-19 pandemic may cause increased levels of stress, anxiety and psychological distress as staff experience physical proximity to other colleagues and members of the public, particularly on public transport. This may result in higher absence rates and impact on the Council's ability to deliver services.	Staff absence rates increase.  Service levels are reduced to vulnerable people.	Likelihood  5  Impact  4	The Council provides mental health support to staff through a variety of means, including; an Employee Assistance Programme which operates 24/7 and provides a range of information and practical support which assists staff. Confidential counselling and an extensive range of CBT workbooks.  A new staff wellbeing handbook is available.  Bespoke support to direct and indirect social care staff.  Risk assessments are in place across the Council which are regularly reviewed as well as Vulnerable Employee Risk Assessment which is regularly reviewed to maintain and improve	Likelihood  4  Impact  3	Director of Human Resources	12

				<p>health and safety support and the on-going need, meet legal responsibilities and government advice and reassure employees.</p> <p>Physical health support is also in place through Kaido and workbooks.</p> <p>Specific communications campaigns also take place on a regular basis</p>			
21	<p>Levels of service demand caused by COVID-19 may continue to be high in the medium term resulting in staff having to work longer which could result in possible breaches of legislation and distress and fatigue. The risk may be exacerbated because more staff may be absent due to seasonal flu.</p>	<p>Possible breaches of Health &amp; Safety and Working Time Regulations if normal practice is not followed.</p> <p>A detrimental impact on staff wellbeing.</p>	<p>Likelihood</p> <p>4</p> <p>Impact</p> <p>3</p>	<p>Agency/casual staff can be brought into supplement and support the workforce.</p> <p>Reduce non-essential work.</p> <p>Monitoring employees' level of work, introduction of a Flexible Working Framework to support employees working in a different way due to the pandemic</p> <p>Bespoke support to direct and indirect social care staff.</p>	<p>Likelihood</p> <p>3</p> <p>Impact</p> <p>3</p>	<p>Director of Human Resources</p>	9

				<p>Revise risk assessments review regularly.</p> <p>Health and Well-Being Surveys undertaken, and actions taken to respond to the concerns.</p>			
22	<p>As employees are encouraged to return to work outside of the home there will be an increase in demand for PPE. If demand increases, there is a possibility that the UK wide position may deteriorate impacting on Coventry. In addition, there is the risk that PPE supplied does not meet the required standards, in which case it cannot be used by staff resulting in a reduction in the workforce available.</p>	<p>Employees refuse to work outside of the home.</p> <p>Workforce reduced resulting in a reduced quality of service.</p> <p>Possible HSE investigations and Employers' Liability claims.</p> <p>Reputational damage to the Council.</p>	<p>Likelihood 4</p> <p>Impact 4</p>	<p>Compliance with Government guidelines on the use of PPE.</p> <p>PPE is checked by the Council's Trading Standards Department to ensure it meets quality standards.</p> <p>Risk assessments are shared and reviewed.</p> <p>Increase PPE supply and tracking of usage.</p> <p>Prioritise PPE to highest risk areas while still maintaining national guidance</p> <p>The management of physical space and social distancing</p> <p>Phased returns</p>	<p>Likelihood 3</p> <p>Impact 3</p>	Service Directors	9

				A targeted communications campaign to remind employees of the need to social distance, wash hands etc.			
23	In the longer term it is likely that there will be a rebalancing between working at a Council property and working from home. There is a risk that if the Council does not manage issues correctly around flexibility and DSE, then there will be an increase in staff absence resulting in a deterioration in service provision.	<p>Deterioration in the quality of service provision.</p> <p>Musculoskeletal injury to staff.</p> <p>Breaches of Health and Safety legislation.</p> <p>Employers' Liability Claims.</p>	<p>Likelihood 3</p> <p>Impact 3</p>	<p>Resources are available for employees to assist them to work safely through the Flexible Working Framework including access to equipment.</p> <p>Occupational Health/Human Resources advice hotline.</p> <p>Risk assessments to be undertaken by employees of homeworking arrangements and shared with managers.</p> <p>Information on DSE and working safely from home available on the intranet.</p>	<p>Likelihood 2</p> <p>Impact 2</p>	Director of Human Resources	4

				Health and well-being support such as 'healthy eyes' provided on a regular basis.			
24	There is a risk that a member of staff could contract COVID-19 and die or suffer a life changing deterioration in their health. The risk is higher based on certain characteristics such as age, gender and ethnicity.	Reporting under RIDDOR is required.  Increased litigation.  Staff may be unable to continue in their job role.	Likelihood  3  Impact  5	Clear advice in line with government guidance and use of appropriate PPE is in place.  The Vulnerable Employee Risk Assessments have been completed. They include consideration of employee characteristics and the mitigation measures required.  Staff suffering a change in their long-term health will be managed through the Council's human resources processes.  This issue is subject to further review by the Council.	Likelihood  2  Impact  5	Service Directors	10
25	There is a risk that the death of a member of staff will impact the mental health and wellbeing of colleagues	Increased sickness absence and poor morale and productivity result in a	Likelihood  3	The Occupational Health and the Employee Assistance Programme provides a range of	Likelihood  2	Service Directors	6



	and have a detrimental effect on the Council's ability to deliver services	negative impact on service delivery	Impact 4	counselling including bereavement support.  The organisation acknowledging and recognising the issue and valuing the contribution made by employees.	Impact 3		
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Theme 6 - GDPR and DPA Compliance							
No	Specific risk description	Impact	Inherent risk score	Measures to mitigate risk	Residual risk score	Risk owner	Risk Score
26	There is a risk that sharing of personal and confidential information will take place in order to achieve an emergency response and the safety and wellbeing of vulnerable individuals, that does not comply with the Council's information governance procedures.	<p>Breach of the General Data Protection Regulation and Data Protection Act. Fines and a loss of reputation.</p> <p>Use of resource responding to referrals from the ICO.</p>	<p>Likelihood</p> <p>3</p> <p>Impact</p> <p>3</p>	<p>Personal data being shared should be recorded; stating what it is and why it is being shared, the purpose, scope, access and security measures. This will help to support the accountability principle in the absence of a data sharing agreement.</p> <p>The ICO have advised that they will take a reasonable and pragmatic approach.</p>	<p>Likelihood</p> <p>1</p> <p>Impact</p> <p>3</p>	Director of Law & Governance	3

**Theme 7 - Support of those that are homeless or at risk of homelessness**

No	Specific risk description	Impact	Inherent risk score	Measures to mitigate risk	Residual risk score	Risk owner	Risk Score
27	If a full risk assessment including mental health capacity and a care act assessment has not been undertaken on all residents housed in houses of multiple occupation/hotels whether housed under homeless legislation or due to COVID-19, then co-ordinated care may not be provided in all instances such as mental health support.	Death or serious injury to persons accommodated in houses of multiple occupation/hotels including non COVID-19 related.	Likelihood 5  Impact 5	<p>COVID-19 guidance has been provided.</p> <p>All have had a review of their disclosed support needs regarding issues such as illnesses/ disabilities and substance misuse etc, which helps inform decisions around placements.</p> <p>A remote tactical COVID-19 weekly meeting, attended by services working with this cohort, enables multi-agency work to be co-ordinated.</p> <p>Face to face work is undertaken by a range of agencies in the hotels housing those most at risk. Some agencies provide remote support.</p> <p>Council rough sleeping staff are on site and hotel staff undertake a</p>	Likelihood 3  Impact 4	Director of Housing & Transformation	12

				<p>handover to Council staff each morning.</p> <p>A new Mental Health worker from Adult Social Care is now in post and provides the link to ensure all residents have the appropriate mental health assessment.</p>			
28	<p>If there is an outbreak of COVID-19 there is a risk that it will be hard to identify and contain because some will not realise that they are symptomatic and may not self-isolate, practice social distancing or assist with contact tracing and there are only five self-isolation units with no additional capacity identified.</p>	<p>Vulnerable people are at risk of COVID-19 and of spreading the infection.</p> <p>Their ability to be treated and/or self-isolated would be compromised.</p>	<p>Likelihood 5</p> <p>Impact 5</p>	<p>All communal areas in buildings are closed.</p> <p>All have been given COVID-19 guidance, with rough sleepers getting face to face advice.</p> <p>Hostel staff monitor individuals leaving buildings and provide advice.</p> <p>The Council currently has 2 hotels. One has Council staff based at it and staff visit the other hotel to support individuals and offer support and advice about self-isolation.</p> <p>A full list of those in each hotel is in place and the</p>	<p>Likelihood 3</p> <p>Impact 4</p>	<p>Director of Housing &amp; Transformation</p>	12

				hotels confirm who has/hasn't stayed the previous evening.  All residents of the hotels have been offered the COVID-19 vaccine. vaccinations will take place at the hotel on the 25 February.			
29	When the furlough scheme comes to an end, an increase in unemployment will result in the number of street homelessness going up. This will impact wellbeing, stretch Council resources and make outbreaks more difficult to control. This will be exacerbated by the end to the eviction moratorium.	Increased street homelessness will have a detrimental impact on wellbeing.  Vulnerable people are at risk of COVID-19 and of spreading the infection.  Their ability to be treated and/or self-isolated would be compromised.	Likelihood  5  Impact  5	Accommodation has been identified if numbers of street homeless increase.  Action possible to direct and assess those who may have COVID-19 and isolate those testing positive.  Maximising the internal and external support of partners to support people to remain in the accommodation.  The Ministry of Housing, Communities and Local Government have committed at least the same Rough Sleeping Initiative funding for 2021-22 and	Likelihood  4  Impact  5	Director of Housing & Transformation	20

				<p>consequently the Council will maintain its current street outreach provision.</p> <p>The Council will continue to actively review resource allocation so that it can react to increases in service demand.</p>			
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Theme 8 - Public Health							
No	Specific risk description	Impact	Inherent risk score	Measures to mitigate risk	Residual risk score	Risk owner	Risk Score
30	There is a risk that the Council's specialist Public Health capacity will be unable to provide the level of service demanded as the Council responds to the crisis.	Public Health will be unable to adequately lead the Council's response to living with and through COVID-19 and the prevention of harm to health.	Likelihood 5 Impact 5	Senior Public Health staff are prioritising workload to focus on COVID-19, managing their personal resilience and that of the wider team. Where possible spreading the leadership responsibilities across the wider Council leadership team.	Likelihood 3 Impact 5	Director of Health & Well-being	15
31	Should the national contact tracing service be moved to local authority ownership, then the required resources will not be available resulting in an ineffective service and reputational damage to the Council.	Greater risk of transmission of COVID-19 within the city and subsequent harm to health and the local economy.  Reputational damage to the Council	Likelihood 3 Impact 5	The Council is working collaboratively across the sub region of CSW to develop models that will best fit the local need.	Likelihood 2 Impact 5	Director of Health & Well-being	10

Theme 9 – Workplaces Reopen							
No	Specific risk description	Impact	Inherent risk score	Measures to mitigate risk	Residual risk score	Risk owner	Risk Score
32	As lockdown gradually ends and staff return to workplaces, there is a risk that the Council will be unable to carry out its functions as the measures required to work safely might be impractical to implement.	<p>Less occupancy as social distancing is required.</p> <p>Physical changes to properties and layout.</p> <p>Staff anxiety about being near colleagues or service users.</p> <p>HSE action leading to prosecution and fines and civil litigation.</p>	<p>Likelihood</p> <p>4</p> <p>Impact</p> <p>5</p>	<p>Government advice and guidance on the measures required have been provided.</p> <p>COVID-19 Protection Team have carried out risk assessment of workplaces and the implementation of measures to reduce the risk of infection to create a COVID-19 secure working environment.</p> <p>Increased working from home in the medium to longer term so that occupancy is reduced.</p> <p>Staff are supported with various wellbeing resources.</p>	<p>Likelihood</p> <p>1</p> <p>Impact</p> <p>4</p>	Director of Property Services & Development	4



Theme 10 – Culture, Tourism and Sport							
No	Specific risk description	Impact	Inherent risk score	Measures to mitigate risk	Residual risk score	Risk owner	Risk Score
33	If measures to contain and reduce the COVID-19 pandemic continue into the medium term the culture, sport and tourism life of the city will be impacted leaving the city less vibrant and prosperous.	<p>The future impact and outcomes of the City of Culture 2021 are uncertain.</p> <p>There is a challenge in how we plan and manage for a year predicated on 2.5m visitors coming to the city.</p> <p>If people travel abroad less there is an opportunity to promote Coventry as a destination to the citizens of the region, though other destinations may receive greater support.</p> <p>Substantial investments have been made in sporting assets, underpinned by financial business plans that did not take</p>	<p>Likelihood</p> <p>5</p> <p>Impact</p> <p>4</p>	<p>City of Culture scenario planning is ongoing with the UK Government and Coventry City of Culture Trust. The start date is now May 2021, and events must be undertaken in a COVID-19 safe way.</p> <p>The Council will consider how it can best promote the City as a safe destination in the new environment.</p> <p>Work with CV Life to agree how facilities can operate in the new socially distanced environment and understand the impact on business plans.</p> <p>All events must be approved by the Safety Advisory Group and Events Coordination Group.</p>	<p>Likelihood</p> <p>4</p> <p>Impact</p> <p>3</p>	Director of Business, Investment & Culture	12

		social distancing into consideration.						
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**Theme 11 – The Economic Prosperity of the City**

No	Specific risk description	Impact	Inherent risk score	Measures to mitigate risk	Residual risk score	Risk owner	Risk Score
34	There is a risk that the combined impacts of COVID-19, combined with exiting the EU Single Market and Customs Union and the non-tariff trade barriers presented by the UK EU Trade & Co-operation Agreement, will have an adverse impact on businesses.	<p>Downsizing or closure of businesses.</p> <p>Redundancies leading to high long-term unemployment (including among younger employees).</p> <p>A decrease in citizens health and wellbeing.</p> <p>An increase in demand for Council services combined with a reduction in resources available to it, through a decrease in the business rates and the tax base. This will have a significant impact on the Council being able to fulfil its statutory responsibilities.</p>	<p>Likelihood</p> <p>5</p> <p>Impact</p> <p>4</p>	<p>The Council is investing in the city. Spending is projected to be £271.8m and includes major scheme expenditure which ranges from investment in the A46 Link Road, Coventry Station Masterplan, Whitley South infrastructure, City Centre South, 2 Friargate, Secondary Schools expansion and the UK Battery Industrialisation Centre</p> <p>Collaboration with local business support partners (fronted by CWLEP Growth Hub) to develop an evidence base and lobby government on local business needs.</p> <p>Business Support Services and Programmes (CW Business Support, Green</p>	<p>Likelihood</p> <p>5</p> <p>Impact</p> <p>3</p>	Director of Business, Investment & Culture	<b>15</b>

				<p>Business, Innovation and Skills 4 Growth. All delivered with local business support partners).</p> <p>Grants and loans including the £10m Additional Restrictions Investment Fund grant</p> <p>Inward Investment Service.</p> <p>Supply chains and networks.</p> <p>Coventry City Council Employer Hub.</p>			
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**Theme 12 – The Identification of Asymptomatic but Infectious Individuals**

No	Specific risk description	Impact	Inherent risk score	Measures to mitigate risk	Residual risk score	Risk owner	Risk Score
35	If the Council is unable to successfully deliver enough testing capacity at different sites across the city then it will be unable to identify asymptomatic individuals resulting in an increase in infection rates, ill health, mortality rates and economic damage.	<p>The chain of transmission will not be broken</p> <p>Those who need to self-isolate will not be aware that they must do so.</p> <p>There will be further outbreaks in the city.</p> <p>Those people most at risk from COVID-19 will suffer ill health and mortality rates will increase.</p>	<p>Likelihood 5</p> <p>Impact 5</p>	<p>Programme leads and a senior responsible officer have been appointed.</p> <p>DHSC has provided blueprints and standard materials that may be used by the Council to design and build any necessary infrastructure to be established.</p> <p>Nine sites are operational. One further site is planned (subject to demand) and a mobile unit is due to go live imminently.</p> <p>Operational management and co-ordination capacity have been identified and implemented to support with resource, quality and supplies.</p> <p>Establishing reliable ICT.</p>	<p>Likelihood 2</p> <p>Impact 5</p>	<p>Director of Housing &amp; Transformation</p> <p>Director of Health &amp; Well-being</p>	10

				<p>Standard Operating Procedure based on DHSC guidelines.</p> <p>Arrangements for the clinical governance of testing in place.</p> <p>Full dress rehearsals before opening.</p>			
36	<p>If the Council is unable to source and/or deploy sufficient trained staff (on an ongoing basis), it will be unable to continue to operate the testing centres resulting in a reduction in the effectiveness of the programme as members of the public are unable to be tested.</p>	<p>Unable to deliver the Council's Standard Operating Procedure.</p> <p>Additional centres cannot open.</p> <p>Insufficient testing capacity.</p> <p>Asymptomatic people continue to circulate resulting in increased infections and harm to vulnerable people.</p> <p>Testing targets missed.</p>	<p>Likelihood 5</p> <p>Impact 5</p>	<p>Further recruitment screenings to ensure that enough staff are available.</p> <p>90% of staff have been recruited from outside the Council.</p> <p>Separate advertising for LFT workers generally and Team Leaders specifically.</p> <p>DHSC provides access to an online training and assessment tool for use by staff and to provide assurance that staff have completed their training.</p>	<p>Likelihood 2</p> <p>Impact 5</p>	<p>Director of Housing &amp; Transformation</p> <p>Director of Health &amp; Well-being</p>	10
37	<p>If the Council is unable to obtain enough PPE it will be unable to deliver the</p>	<p>If staff are not properly protected, they may become infectious.</p>	<p>Likelihood 3</p>	<p>Recruited to new post to oversee kit requirements and storage.</p>	<p>Likelihood 2</p>	<p>Director of Housing &amp; Transformation</p>	10

	testing service safely resulting in a drop in testing capacity.	<p>Insufficient testing capacity.</p> <p>Asymptomatic people continue to circulate resulting in increased infections and harm to vulnerable people.</p> <p>Testing targets missed.</p> <p>Reputational damage to the Council.</p>	<p>Impact</p> <p>5</p>	Initial PPE requirements are sourced by the DHSC. Subsequent requirements are made by the Council or Local Resilience Forum.	<p>Impact</p> <p>5</p>	Director of Health & Well-being	
38	If the DHSC is unable to supply enough LFD antigen testing kits or does not supply them after 31 March 2021 then the Council may be unable to deliver the required testing capacity.	<p>Insufficient testing capacity</p> <p>Asymptomatic people continue to circulate resulting in increased infections and harm to vulnerable people.</p> <p>Testing targets missed.</p>	<p>Likelihood</p> <p>2</p> <p>Impact</p> <p>5</p>	<p>There is a contractual responsibility on the DHSC to supply testing kits until 31 March 2021.</p> <p>It is required that the DHSC and Council work in a spirit of partnership.</p> <p>The Council gives daily reports on the use supplies to assist DHSC planning.</p> <p>An advance order of 48,000 test kits has arrived and the order process for additional kits</p>	<p>Likelihood</p> <p>1</p> <p>Impact</p> <p>5</p>	<p>Director of Housing &amp; Transformation</p> <p>Director of Health &amp; Well-being</p>	5

				(if required) is understood. Supply should be ample, however any changes to the national demand could still impact future lead times.			
39	If the Council is unable to obtain enough funding in support of testing it may have to reduce the number of centres, restrict the number of tests an individual can have or divert funding from other Council priorities.	<p>Testing capacity is reduced.</p> <p>Asymptomatic people continue to circulate resulting in increased infections and harm to vulnerable people</p>	<p>Likelihood 3</p> <p>Impact 5</p>	<p>Funding at agreed rates per test is in place until 31 March 2021.</p> <p>Government has confirmed that costs incurred reasonably and with best endeavours to keep the costs as low as possible, up to the limit of £14 x number of tests planned (less the value of goods supplied by DHSC shall be recoverable.</p> <p>The Council has worked with suppliers to understand costs.</p> <p>A finance reporting regime is in place that will enable the Council to maintain reliable, accessible and up to date accounting records with an adequate audit</p>	<p>Likelihood 2</p> <p>Impact 5</p>	<p>Director of Housing &amp; Transformation</p> <p>Director of Health &amp; Well-being</p>	10



				trail for all expenditure funded by grant monies.			
40	If the Council is unable to encourage target groups to participate in testing, then the programme will be ineffective resulting in asymptomatic people circulating in the community.	Asymptomatic people continue to circulate resulting in increased infections and harm to vulnerable people	Likelihood 4 Impact 5	<p>There are different populations targeted for testing agreed with DHSC.</p> <p>The testing programme is being led locally by the Council to ensure that the programme focuses on the circumstances and needs of the population of the area.</p> <p>Social media posts and active community engagement to promote test sites. Leaflets/posters being distributed.</p> <p>Locations and opening hours available on the Council's website.</p> <p>Sites are accessible for the targeted populations.</p> <p>Drive through and mobile testing options.</p>	Likelihood 3 Impact 5	<p>Director of Housing &amp; Transformation</p> <p>Director of Health &amp; Well-being</p>	15

				Minimum age requirement to access testing reduced to 2 years+ to encourage testing of younger school age children.			
41	If there is a significant change of approach to Lateral Flow Testing announced by government after 31 <sup>st</sup> March, then the operating model currently in being used may no longer be effective or fit for purpose.	This would result in delays in testing people under any new model until fully mobilised and would have financial implications for mobilisation of alternatives at short notice.	<p>Likelihood 4</p> <p>Impact 4</p>	<p>Scenario plans to be drawn up to ensure that the Council can flex the workforce either up (should lockdown restrictions be eased leading to a rise in demand) or fall (should changes be towards other models such as home testing).</p> <p>The deployment of the mobile site will ensure that the Council can test in all areas of the city. Static locations will be reviewed together with the potential to extend leases where required.</p>	<p>Likelihood 4</p> <p>Impact 3</p>	<p>Director of Housing &amp; Transformation</p> <p>Director of Health &amp; Well-being</p>	12



Audit and Procurement Committee

15 March 2021

**Name of Cabinet Member:**

Cabinet Member of Policy and Leadership – Councillor G Duggins

**Director Approving Submission of the report:**

Director of Law and Governance

**Ward(s) affected:**

None

**Title:**

Information Governance Annual Report 2019/2020

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**Is this a key decision?**

No

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**Executive Summary:**

Information is one of the Council's greatest assets and its correct and effective use is a major responsibility and is essential to the successful delivery of the Council's priorities. Ensuring that the Council has effective arrangements in place to manage and protect the information it holds is a priority.

Data protection legislation sets out the requirements on public organisations to manage information assets appropriately and how they should respond to requests for information. The Information Commissioner's Office (ICO) is the UK's independent supervisory authority set up to uphold information rights in the public interest, promote openness by public bodies and data privacy for individuals, and monitors compliance with legislation.

The Information Governance function supports the Council's compliance with the Freedom of Information Act 2000 (FOIA), Environmental Information Regulations (EIR), General Data Protection Regulations GDPR (now UK GDPR) and Data Protection Act (DPA) 2018. The Council has a statutory obligation to comply with this framework by responding appropriately to requests and managing personal data appropriately.

The Information Governance Team supports the organisation in meeting these requirements, co-ordinating and providing support to the Council's activity including co-ordinating requests received under legislation. The Data Protection Team, comprising the Data Protection Officer (DPO), the Head of Information Governance, and four Information Governance Officers) manage the organisations' approach to data protection including the management of data protection security incidents.

This report provides a summary of the Council's performance during 2019/2020 in responding to requests for information received under the Freedom of Information Act, Environmental Information Regulations and Data Protection Act. It also reports on the management of data protection security incidents reported and data protection training.

**Recommendations:**

- 1) The Audit and Procurement Committee is recommended to note:
  - a) The Council's performance on Freedom of Information, Subject Access and other Data Protection Act requests, including the outcomes of internal reviews and the number and outcome of complaints made to the ICO.
  - b) Reporting and management of data security incidents.
  - c) Data Protection training compliance
- 2) The Audit and Procurement Committee is recommended to identify any comments or recommendations

**List of Appendices included:**

None

**Background papers:**

None

**Other useful documents**

None

**Has it been, or will it be considered by Scrutiny?**

No

**Has it been, or will it be considered by any other Council Committee, Advisory Panel or other body?**

No

**Will this report go to Council?**

No

## Report title: Information Governance Annual Report 2019/20

### 1. Background

- 1.1 The Council's Information Governance arrangements support it in managing information and complying with legislation and regulations including the Freedom of Information Act 2000 (FOIA), Environmental Information Regulations 2004 (EIR), General Data Protection Regulation (now UK GDPR) and Data Protection Act (DPA) 2018. The Council has a statutory obligation to comply with this framework by responding appropriately to requests and managing personal data appropriately.
- 1.2 The Council is obliged to respond to information requests under the FOIA/EIR within 20 working days, subject to relevant exemptions. The Code of Practice, issued by the Secretary of State for Constitutional Affairs under Section 45 of the FOIA, requires public authorities to have a procedure in place to deal with complaints in regard to how their requests have been handled. This process is handled by the Information Governance Team as an FOI/EIR internal review.
- 1.3 After an internal review has been completed an applicant has a right to complain to the Information Commissioner's Office (ICO) for an independent ruling on the outcome. Based on the findings of their investigations, the ICO may issue a Decision Notice. The ICO may also monitor public authorities that do not respond to at least 90% of FOI/EIR requests they receive within 20 working days.
- 1.4 The DPA 2018 provides individuals with the right to ask for information that the Council holds about them. These are also known as Subject Access Requests (SARs). The Council should be satisfied about the individual's identity and have sufficient information about the request. Following the introduction of the GDPR, the timescale for responding to these requests was reduced from 40 calendar days to one month, starting on the day of receipt. Authorities can extend the time taken to respond by a further two months if the request is complex or a number of requests have been received from the individual, e.g. other types of requests relating to individuals' rights.
- 1.5 There is no requirement for the Council to have an internal review process for SARs. However, it is considered good practice to do so. Therefore, as with FOIA/EIR requests, the Council informs applicants of the Council's internal review process. However, individuals may complain directly to the ICO if they feel their rights have not been upheld.
- 1.6 The Council also receives one-off requests for personal information from third parties including the police and other government agencies. The Information Governance Team maintains a central log that includes exemptions relied on when personal data is shared with third parties. The Team gives advice and assesses whether the Council is allowed to disclose the information or not.
- 1.7 The Council also has arrangements in place to manage data protection security incidents where has been or could be compromised and the Council's Data Protection Team records, investigates and where necessary, recommends actions to be taken based on the risk level.
- 1.8 The Information Governance Team also supports the Council in understanding the impact of plans, projects and activities on data protection through a process of impact assessments to support decision-making. The Council also has arrangements in place to support the sharing of data where appropriate and the team provide support in the preparation and sign off of on-going and one-off data sharing agreements.

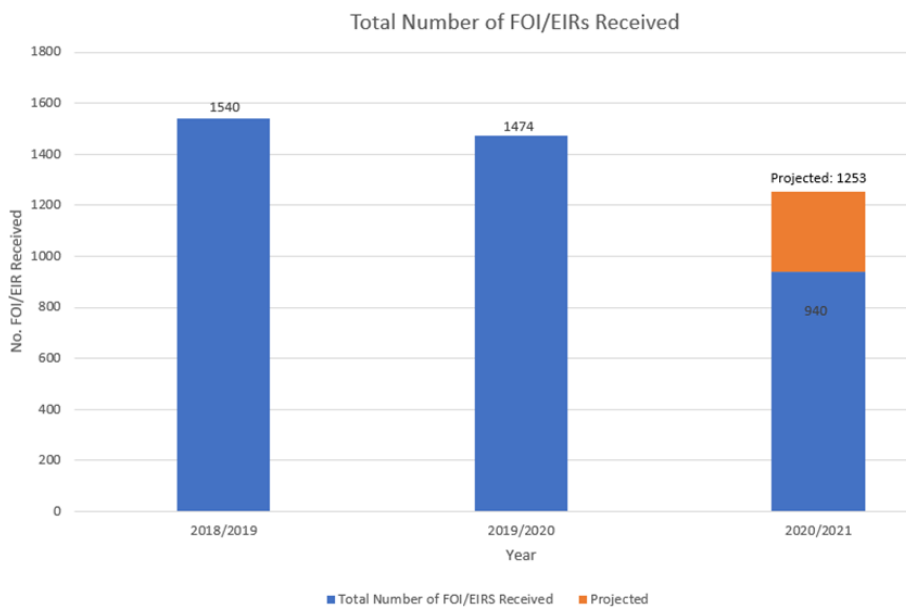
- 1.9 While this report covers the year 2019/20 and a future report will address the current year, the landscape in which public authorities are now operating has changed significantly since 2018, which saw the introduction of the GDPR and the new Data Protection Act 2018 (DPA 2018). At the end of the 2019/20 year, the country went into lockdown as part of its response to the Covid 19 pandemic and the impact of Brexit has subsequently led to introduction of the UK GDPR.
- 1.10 The pandemic has resulted in significant changes to ways of working and priorities. During this period, the Information Governance Team has supported the Council to adapt and keep working effectively. It has facilitated the rapid turnaround of sharing requests and needs whilst ensuring requests have been properly assessed to confirm that the personal data of the people concerned is used correctly, is properly protected, is only used for the purpose for which it has been provided and only retained as long as is necessary and in keeping individuals informed of how their data is handled. This has allowed data to flow compliantly for the purposes of the Council's pandemic response. It has supported the organisation as new ways of working have been introduced to meet needs while ensuring the continuing protection of information.
- 1.11 The introduction of GDPR brought an increase in requests for personal data (SARs), it strengthens the rights of individuals and promotes their control over the way that their data is used. The pandemic and subsequent lockdowns have seen little difference in the numbers of requests.
- 1.12 The Council's approach to information governance continues to evolve and priorities include re-establishing the Information Management Strategy Group following a review of its terms of reference and the appointment of the Director of Law and Governance as the Council's Senior Information Risk Officer; the establishment of an effective framework for the management of information risks; the introduction of a new management system for dealing with information requests; launching a new scheme of data protection and information security training and ensuring comprehensive take up; and ensuring that the Council's activities and allocation of resources continue to support effective information governance arrangements.
- 1.13 Requests for information**
- 1.13.1 The number of Freedom of Information Requests received by the Council increased year on year to 1,540 in 2018/19 and a small reduction to 1,474 was seen in 2019/20 (see table 1). The Council responded to 78% of FOIA/EIR requests within the target time of 20 working days in 2019/20 compared to 62% for the previous year (see table 2). While the proportion of requests dealt with within the target time has improved, performance remains below the 90% target set by the ICO.
- 1.13.2 The Council received 48 requests for internal reviews in the year 2019/20. The Council responded to these with the following outcomes:
- 13 were not upheld – the exemptions that had been applied were maintained and no further information was provided
  - 11 were not upheld – more information or clarification was provided
  - 6 were partially upheld – some further information was provided
  - 15 were upheld - information was provided
  - 1 was upheld – a further exemption was engaged
  - 1 was withdrawn
  - 1 was closed with no further action
- (32 requests for internal reviews have been received during the first three quarters of 2020/21).

1.13.3 Five complaints were referred to the ICO during 2019/20. The reasons and outcomes for these were:

- Requester stated that they had not received a response. The response to the FOI had been issued on day 23. The was ICO notified and there was no further action.
- The response was reviewed and a revised response issued. The ICO was notified and there was no further action.
- The requester submitted an amended request and the complaint was withdrawn.
- A complaint that the requested information had not been provided was not upheld and the ICO found in favour of the City Council.
- In response to a complaint about the handling of an EIR request, the complaint was not upheld and the ICO issued a decision notice.

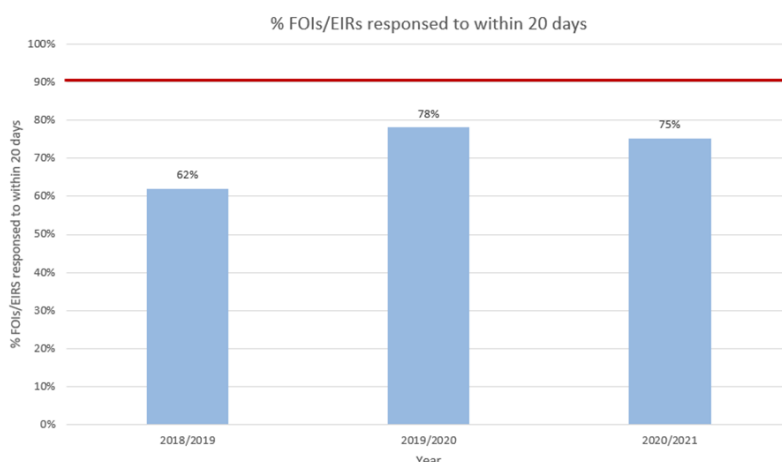
(Two complaints have been referred to the ICO during the first three quarters of 2020/21 and both are awaiting the allocation of an ICO case worker. No details relating to the complaints have been made available).

**Table 1. Number of FOI/EIR requests received**



Figures for 2020/2021 Financial Year include the data for April-December 2020 (Q1-3)  
If current trend continues, expect 1,253 FOI/EIRs to be received in 2020/2021

**Table 2. Proportion of FOI/EIR requests completed within target time**

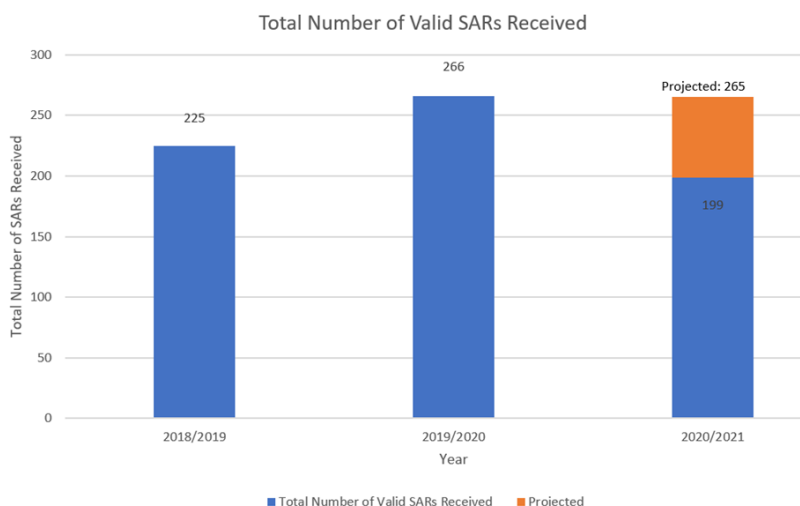


ICO Adequate Response Rate – 90%

Figures for 2020/2021 Financial Year include the data for April-December 2020 (Q1-3)

- 1.13.4 The City Council already publishes a significant amount of information and identifying opportunities to increase the volume and type of information published (subject to legal compliance) will increase transparency and help to reduce the number of FOI's the Council receives, if the information is already available.
- 1.13.5 The Council received 266 valid Subject Access Requests (SARs) during the course of 2019/20, compared to 225 in the previous year (see table 3). The number of SARs has been rising year on year with a significant increase seen following the introduction of the GDPR. While the Council receives fewer SARs than other information requests, many of these are complex and can involve managing significant amounts of sensitive information. The introduction of the GDPR also reduced the required response time for responding to SARs from 40 days to one calendar month. The completion rate within the target time has remained broadly the same at 72% (see table 4).

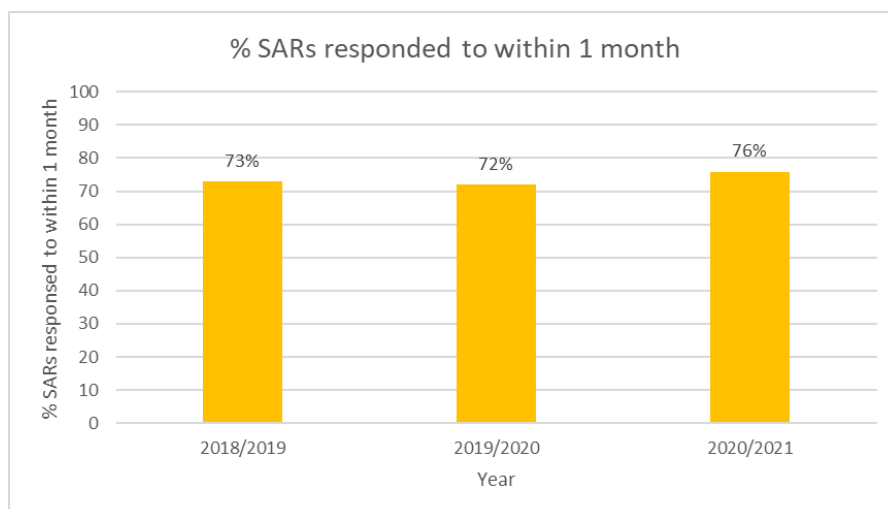
**Table 3. Number of SAR's received**



Figures for 2020/2021 Financial Year include the data for April-December 2020 (Q1-3)  
 If current course continues, expect 265 SARs to be received in 2020/2021



**Table 4. Proportion of SARs responded to within target time**



NB. % complete within either 1 month, or 3 months where complex extension applies in 2020/2021 is 81%  
Figures for 2020/2021 Financial Year include the data for April-December 2020 (Q1-3)

- 1.13.6 The Council received four requests to carry out an internal review into a SAR application during 2019/10. In three cases, further information was provided. The information requested in the fourth was not held by the Council. (13 requests for reviews have been received during the first three quarters of 2020/21).
- 1.13.7 One complaint was referred to the ICO and the exemption applied by the Council was upheld. (One complaint has been referred to the ICO during the first three quarters of 2020/21.)

#### **1.14 Data Protection Security Incidents and Reports**

- 1.14.1 Protecting information from theft, loss, unauthorised access, abuse and misuse is important in order to reduce the risk of data breaches or financial loss incurred through non-compliance with key legislation such as the DPA. It is good practice to report on information incidents and breaches.
- 1.14.2 An effective data protection security incident reporting process ensures that any breaches are contained and managed promptly and the outcomes of the investigation are used to inform reviews of the controls that are in place to keep personal information secure. The reporting of near misses is also actively encouraged. The process allows the organisation to learn from mistakes and prevent serious personal data breaches that may cause harm to individuals and the Council.
- 1.14.3 The Council encourages the reporting the reporting of near misses and potential breaches as this promotes awareness, avoids complacency thus reducing the likelihood of a serious breach to information. Increased data protection awareness encourages an increase in reports and investigations although not all reported incidents will have resulted in a breach. Even where there is no breach, incidents can provide valuable insight into training requirements and processes and procedures which may need to be strengthened as a preventative measure.

- 1.14.5 A risk assessment is used to inform the action required and is based on the likely or actual harm to individuals, number of individuals affected and the level of sensitivity of the personal information compromised. The risk assessment score used is based on guidance issued by the Health and Social Care Information Centre (HSCIC) which takes into account the impact and likelihood the breach would have on the individuals.
- 1.14.6 In 2019/20, the Data Protection Team received 219 reports of potential data security incidents. Of these, 156 did not involve a breach of personal data. These included for example near misses, loss or theft of equipment, cases where technical measures prevented access to data and incidents where a potential breach was contained. Of the 63 incidents where a breach of personal data was identified, 42 were identified as low risk, 13 low/medium, 7 medium and 1 high. The majority of these were classified as information being disclosed in error with 5 incidents logged as a result of unauthorised access and 4 as technical/ procedural failures. The GDPR introduced requirements for personal data breaches that meet certain thresholds to be reported to the ICO. No self-reports were made to the ICO during 2019/20 compared to one in 2018/19. One complaint was made by a data subject directly to the ICO who advised an informal resolution with the City Council. While there had been a technical/procedural error, no data had been breached.

## **1.15 Training and Awareness**

- 1.15.1 Data Protection training is key to ensuring staff are aware of their responsibilities. Training is currently delivered through the Council's e-learning platform and annual completion of the data protection course is mandatory for all staff handling personal data. Staff who do not have access to a computer in their role (not office based) and those with minimal personal data involved in their role are provided with alternative training. This ensures that an appropriate level of understanding and awareness is reached that is relevant to their role/responsibilities. In addition to the Data Protection Training there is also a need to provide specific Cyber Security training. Data Protection and Cyber Security are two separate complementary areas with equal importance for different reasons. Data Protection is about how we protect personal data that we collect and process, regardless of format (online/paper) and remain compliant to information laws. Cyber security is how individuals and organisations reduce the risk of cyber-attack, malware, identifying malicious emails. Its focus is on how the devices (smartphones, laptops, tablets and computers) and the services accessed are protected from theft, damage, and unauthorised access to information we store on our devices, and online. As cyber-attacks generally involve targeting unsuspecting people, luring them to either provide information or a way into our systems. Cyber Security awareness will support employees to be more vigilant about their use of ICT and how that can be exploited opportunistically.
- 1.15.2 For the 2019/20 year, the Council reported a completion rate of the Council's mandatory data protection training of 90.64% when completing NHS Data Security and Protection Toolkit. This self-assessment tool enables public authorities to demonstrate their ability and commitment to maintain the confidentiality and security of personal information, particularly health and social care personal records. The Council met all of the standards, with the exception of that related to training which requires a minimum completion rate of 95%.
- 1.15.3 Meeting the level of 95% compliance is a priority as it is a key part of the Council's approach to protecting data and provides assurance to other organisations when they share data with the City Council. Work continues to promote take up across the authority and plans are in place for the roll out of new refreshed online training.

## **2 Options considered and recommended proposal**

- 2.1 It is important that the Council continues to monitor and report on its performance in relation to access to information requests, data protection security incidents and training completed in order to promote best practice information governance and drive continuous improvement in the Council's ability to comply with the laws relating to information.

## **3 Results of consultation undertaken**

- 3.1 None

## **4 Timetable for implementing this decision**

- 4.1 None

## **5 Comments from the Director of Finance and the Director of Law and Governance**

### **5.1 Financial implications**

There are no specific financial implications resulting from the issues within this report although it is worth noting that the Information Commissioner's Office is able to levy significant fines for serious non-compliance with the legislation surrounding the management of information.

### **5.2 Legal implications**

There are no specific legal implications arising out of the recommendations. However, the Council's performance is subject to external scrutiny by the ICO, who have the authority to impose sanctions upon the Council for non-compliance. The monitoring and reporting on the outcomes of ICO complaints represents good practice and promotes good governance and service improvement.

## **6 Other implications**

### **6.1 How will this contribute to the Council Plan ([www.coventry.gov.uk/councilplan/](http://www.coventry.gov.uk/councilplan/))?**

The monitoring and reporting of the Council's performance regarding responding to, and handling access to information requests under FOIA and DPA 2018, including any complaints made to the ICO will enable continuous improvement, raise awareness and promote high standards of information governance, fostering a culture of openness and transparency within the Council and demonstrating our commitment to best practice information governance, security, and protection.

### **6.2 How is risk being managed?**

The reporting and monitoring on the Council's performance to information laws and outcomes of ICO complaints will help reduce the risk of the ICO upholding complaints and taking enforcement action against the Council.

### **6.3 What is the impact on the organisation?**

Meeting best practice for information governance will support public confidence in the Council, offering assurance to service users of the council's commitment to data protection and transparency. Partner and client organisations will have the assurance they required in order to engage with the Council and share data. The risks of serious

breaches of personal data/information assets should be reduced thus reducing the likelihood of action by the ICO.

#### 6.4 Equality Impact Assessment (EIA)

The Council's responsibilities under Section 149 of the Equality Act 2010 are supported by UK GDPR/DPA2018, requiring that Special Category Data is afforded extra measures of security to protect that data.

#### 6.5 Implications for (or impact on) climate change and the environment

None

#### 6.6 Implications for partner organisations?

As set out in section 6.3 of the report.

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