

# **CORPORATE GOVERNANCE COMMITTEE**

## **18 JANUARY 2019**

# REPORT OF THE DIRECTOR OF CORPORATE RESOURCES

# RISK MANAGEMENT UPDATE

## **Purpose of the Report**

- 1. One of the key roles of the Corporate Governance Committee is to ensure that the Council has effective risk management arrangements in place. This report assists the Committee in fulfilling that role by providing a regular overview of key risk areas and the measures being taken to address them. This is to enable the Committee to review or challenge progress, as necessary, as well as highlight risks that may need to be given further consideration. This report covers:
  - The Corporate Risk Register (CRR) an update on risks
  - Updates on: -
    - Risk Management General
    - Risk Management Maturity Health Check
    - Risk Management Policy and Strategy
    - Insurance
    - Counter Fraud

## **Corporate Risk Register (CRR)**

- 2. The Council maintains Departmental Risk Registers and a Corporate Risk Register (CRR). These registers contain the most significant risks which the Council is managing and which are 'owned' by Directors and Assistant Directors.
- 3. The CRR is designed to capture strategic risk that applies either corporately or to specific departments, which by its nature has a long time span. Risk owners are engaged and have demonstrated a good level of awareness regarding their risks and responsibilities for managing them.
- 4. The CRR is a working document and therefore assurance can be provided that, through timetabled review, high/red risks will be added to the CRR as necessary. Equally, as further mitigation actions come to fruition and current controls are embedded, the risk scores will be reassessed and this will result in some risks being removed from the CRR and reflected back within the relevant departmental risk register.

5. Movements since the CRR was last presented to the Committee on 24 October 2018 are detailed below.

### Risks Added

- Risk 1.9 (Children & Family Services) If the immigration status of unaccompanied asylum-seeking children (UASC) who arrive in the County is not resolved, then the Council will have to meet additional long term funding in relation to its housing and care duties.
- Risk 10.1 (Children & Family Services) If the Local Authority and partners
  do not succeed in developing an inclusive culture across all schools,
  education providers and partner agencies (including the Parent Carer
  Forum), then it will be difficult to secure parental confidence in the ability of
  the 'whole system' to meet the needs of the large majority of children with
  SEND in a mainstream school context.

### Risk Reworded.

- Risk 1.6. If the High Needs Block Development Plan is not delivered on time and within budget then the number and cost of specialist placements is likely to exceed current predictions and the High Needs Block Budget will exceed latest forecasts.
- Risk 2.2 Impact on County Council services and its MTFS of the Better Care Together (medium term) Transformation Plan in Leicester, Leicestershire and Rutland (LLR), could lead to an inability to deliver improved outcomes and financial sustainability.
- 6. The most up-to-date position of the risks on the CRR is shown in the table below. The risks are numbered within each category. The full CRR is attached as Appendix A to this report.
- 7. The arrows explain the direction of travel for the risk, i.e. where it is expected to be within the next twelve months after further mitigating actions, so that:
  - a. A horizontal arrow shows that not much movement is expected in the risk;
  - A downward pointing arrow shows that there is an expectation that the risk will be mitigated towards 'medium' and would likely be removed from the register;
  - c. An upwards pointing arrow would be less likely, but is possible, since it would show that the already high scoring risk is likely to be greater.

Dept./ Function	CRR Risk No	Risk Description	Current Risk Score (incl changes)	Update Based on risks discussed at department's management teams during December 2018	Direction of Travel (Residual Risk Score over the next 12 months)
1. Me	edium	Term Financial Strat	egy (MTFS)		
All	1.1	Risk around the MTFS including the ability to deliver savings through service redesign and Transformation as required in the MTFS, impact of the living wage and other demand and cost pressures.	25	MTFS The draft MTFS has been prepared and savings requirements incorporated. Continuing pressure on budgets underlines the growing demand impacting the Council's services, social care and special educational needs and disability support in particular. The Local Government Finance Settlement (13 December 2018) provided no direction on medium term funding but was positive in terms of additional one off monies being received e.g. business rates.  Transformation The full business case for the Early Help Review (including Children's Centres) has been approved by the Transformation Delivery Board.	Expected to remain high/red
CE	1.3	If S (106) monies for the Council as a whole are not managed properly then there could be financial risks as well as legal challenges.	16	No change to the previously reported position.	Expected to remain high/red
CR	1.4	If claims relating to uninsured risks materialise or continue to increase then LCC will need to find increased payments from reserves,	16	See specific update	Expected to remain high/red

		impacting on funds available to support services			
C&FS	1.5	Social Care: If the number of high cost social care placements (e.g. external fostering, residential and 16+ supported accommodation) increases (especially in relation to behavioural and CSE issues) then there may be significant pressures on the children's social care placement budget, which funds the care of vulnerable children.	25	There have been new entrants into residential and high cost 16+ provision during November, and due to children's' ages the Service is only projecting exit from residential placement to commence from June 2019.  All children have their own individual needs and are in residential care for a range of reasons. Timing of exit from residential care also needs to take into account the child's educational needs, provision and status e.g. it would be unlikely that management would authorise a change of placement during a child's GCSE year.  The increase in use of 16+ placements during 2018/19 has been positive as a number of these young people have transitioned from higher cost placements or would otherwise have required residential care. Similarly, the Supported Lodgings recruitment during this year has exceeded targets, enabling a number of older children to transition from high cost placements into the community.	Expected to remain high/red
C&FS	1.6	Education: If the High Needs Block Development Plan is not delivered on time and within budget then the number and cost of specialist placements is likely to exceed	25	There has been an external challenge (by an independent SEND Company) of the Council's High Needs Block Development Plan.	Expected to remain high/red

		current predictions and the High Needs Block Budget will exceed latest forecasts			
CR	1.7	If the Council is not compliant with the HRMC IR35 regulations regarding the employment of self-employed personnel then there is a risk of large financial penalties	20	The requirement for a central support role has been agreed, and recruitment is almost complete.  A reminder of the Policy and Process was included in the Managers Digest (28 September), including the use of Reed Employment Agency for all recruitment activity, but due to the complexity of interpreting IR35 regulations, Managers may need further support.  The emphasis on IR35 compliance was provisionally for the public sector but is being extended to the private sector to provide an equal footing.	Expected to move to medium/ amber
CR	1.8	If public sector partners and major providers of services to the public sector get into financial difficulties there could be an impact on both the Council's financial position and services	16	The financial strength of suppliers is included in the contract management dashboard for key suppliers, alongside other performance data and the Council's spend (dashboard being piloted by Corporate Resources). This supplements the financial checks undertaken as part of the procurement process.  There will be a refresh of an initial supplier stability review undertaken in June 2018.	Expected to increase
C&FS	1.9	If the immigration status of unaccompanied asylum-seeking children (UASC)	16 <b>(New)</b>	The increase in the risk score is twofold:  1. Whilst overall numbers are stable, most UASC are now classed as care leavers or entitled to care leaving	Expected to move to medium/

		who arrive in the County is not resolved, then the Council will have to meet additional long term funding in relation to its housing and care duties.		support by law. As children in care get older, the law requires that they have both a social worker and personal advisor allocated to support them from 15.5 years until the age of 18. From the ages of 18-25 the statutory support is the responsibility of the personal advisor. The UASC team will not have the personal advisor capacity to meet this statutory requirement.  2. The duty to support Care Leavers has been extended (from 21) to age 25 years. As UASC do not have local connections, it is expected that they be more likely to will seek to access this extended service. And whilst new UASC enter the service, older UASC will not be leaving placing additional pressures on the budget for benefits, housing etc. There has been a recent increase in the	amber
				number of UASC arriving for whom this is likely to	
2. He	alth &	Social Care Integrate	tion	apply.	
All	2.2	Impact on County Council services and MTFS of the Better Care Together (medium term) transformation plan in Leicester, Leicestershire and Rutland (LLR), could lead to inability to deliver improved outcomes and financial sustainability.	16	The NHS Long Term Plan was published on 7 January. Each part of the country (in this case Leicester, Leicestershire and Rutland) will be expected to develop their local plans further in response to this during 2019. The County Council will review this risk again in 2 months' time	Expected to remain high/red

All	2.3	Challenges caused by the Welfare Reform Act 2012 and the Welfare Reform and Work Act 2016.	16	Ongoing provision of citizen's advice including money and debt advice funded by LCC and District Councils. From April 2019 Citizen's Advice Bureaus (CABs) will also be funded by DWP to provide Universal Credit support. Currently stable level of demand for hardship support services.	Expected to remain high/red
3. IC	T, Info	rmation Security			
CR	3.2	If the Council fails to meet the information security and governance requirements then there may be breach of the statutory obligations	16	With regard to training on Information Security and Data Protection latest data on the Council's Learning Hub shows 90% compliance against a target of 90%. However, ongoing requirements to review training every 12 months could impact on the compliance rate. Phase 2 elements of the GDPR has been scoped and agreed. Work is progressing on surveillance and camera systems, procurement of an asset register system, and it is envisaged that all actions will be completed by March 2019.	Expected to move to medium/ amber
All	3.5	If the Council fails to maintain robust records management processes to effectively manage information under its custodianship, personal data may not be processed in compliance with the Data Protection Act 1998 resulting in regulatory action and/or reputational damage.	15	A further report will be presented to Chief Officers in January 2019, proposing a Data Protection Impact Assessment (DPIA) approach. This approach will assist in establishing priority areas and minimise data protection risks.	Expected to move to medium/ amber

CR	3.6	If a replacement (ERP) system is not implemented successfully the Council will not reap the benefits and the Council's financial and HR activity could be negatively impacted upon	20	Data cleansing has commenced and this will be an ongoing activity for the next six months.  To assess the system functionality requirements, a series of advisory workshops have been completed with positive outcomes – further workshops are planned in 2019.  After the workshops are all completed the initial configuration of the system will be made and reviewed in February 2019.	Expected to move to medium/ amber
C&FS	3.7	If the quality of data in Children and Families (C&FS) Information Management System is too low to satisfy statutory requirements (e.g. data returns) this will impact upon service delivery	16	Strongly embedded monthly business support processes but need to do further work with Business Intelligence to ensure regular access to tableau reporting to enable C&FS to manage their own data quality issues.	Expected to move to medium/ amber
4. Co	ommis	sioning & Procureme	ent		
CR	4.1	If the Authority does not obtain the required value and level of performance from its providers and suppliers then the cost of services will increase and service delivery will be impacted.	15	Contracts dashboard (covers high risk and value business critical contracts) was presented to the Corporate Resources Management Team in December and the format has been agreed and dashboards will be rolled out to other departments.  Guidance on setting and monitoring KPI's will be	Expected to move to medium/ amber

				incorporated into the new toolkit by December.  Action is being taken to evaluate the effectiveness of	
				measures taken on improving the management of contracts.	
				Due to resource capacity, discussions are underway with Learning and Development to undertake a training needs analysis with a view to procuring appropriate trainer.	
E&T	4.2	If Arriva is successful in its concessionary travel appeal then reimbursement	15	No change to previously reported position.	
		costs for the total scheme could increase significantly.			Expected to move to medium/ amber
5. Sa	afegua	rding			
C&FS	5.1	Historical: If as a result of a concerted effort to explore abuse by the Independent Inquiry into Child Sexual Abuse (IICSA) and Police Operations, then evidence of previously unknown serious historical issues of child sexual exploitation (CSE) or abuse is identified	25	The IICSA announced in September that the Public Hearings for the Janner Investigation will be held for 3 weeks in February 2020. A Preliminary Hearing has been scheduled by the IICSA for 23 May 2019 at which details regarding the Public Hearings will be agreed.	Expected to remain high/red
All	6.1	Uncertainty and	16	With an increased likelihood of	
7 111		significant knock on consequences	.0	a non-deal exit, more detailed contingency plans are being	

7. Pe	onlo	on public services (including potential legal, regulatory, economic and social implications), and the local economy as a result of the United Kingdom leaving the European Union		developed by the LLR Resilience Forum and Partnership and the Council's Business Continuity team. Progress will be reported to Chief Officers at the end of January 2019.	Expected to remain high/red
7. 16	opie				
CR (ALL)	7.1	If sickness absence is not effectively managed then staff costs, service delivery and staff wellbeing will be impacted	16	The Intensive Support Project is ongoing.  Trade Unions have not accepted the position with regard to tightening of the Absence Management Policy - the initial target is to reduce absence to 8 days per FTE by August 2019 recognising that the corporate target remains at 7.5 days FTE. Discussions are underway on the next steps.	Expected to remain high/red
All	7.2	Recruitment and retention If departments are unable to recruit and retain skilled staff promptly then some services will be over reliant on the use of agency staff resulting in budget overspends and poor service delivery	25	Elements of a recruitment and retention strategy have been agreed and implemented. Social worker apprenticeship posts (6) will be in place from next year and the first frontline unit (consisting of 4 social workers) is in place. There is a steady recruitment of staff but the majority of social work posts recruited are newly qualified social workers which bring pressures of how these staff are supported (require i.e. extra support, knowledge etc. but not in a position to take on the full case load of a social worker).	Expected to remain high/red

				A&C (risk score =16) No change to previously reported position. The rates of pay are not competitive for certain posts resulting in recruitment difficulties and competition from other Authorities.	
A&C	7.3	If the department does not have a sustainable external workforce to work with it may be unable to meet its statutory responsibilities.	16	Although a small project - 'external workforce' has been established to work with the authority's providers to target more effective recruitment and retention, this has not yet had the desired impact. This is largely due to the rates of pay not being competitive for certain posts and competition from other Authorities.	Expected to move to medium/ amber
8. Bu	siness	Continuity			
CE	8.1	If suppliers of critical services do not have robust business continuity plans in place, the Council may not be able to deliver services.	15	A report is scheduled to be presented to Chief Officers in January 2019 to provide an update on Business Continuity and Leicester, Leicestershire, and Rutland (LLR) Prepared activity.	Expected to remain high/red
9. En	vironm	ent			
E&T	9.1	If the ash dieback disease causes shedding branches or falling trees then there is a possible risk to life and disruption to the transport network.	15	No change to the previously reported position.	Expected to move to medium/ amber
E&T	9.2	If there was a major incident which results in unplanned site closure (E.g. fire) then	15	Actions being taken are as follows: Management of contracts: Landfill contracts are being reviewed and amended to reflect changing disposal	Expected to move to

		the Council may be unable to hold or dispose of waste.		sites and potential for additional alternative sites.  Regular contract meetings with disposal and treatment providers are being undertaken.  Additional contingency options for contracted Waste Transfer capacity are being explored with providers  Business Continuity: Regular communications are undertaken with the District Councils to manage changes in delivery locations and move away from landfill as the primary disposal outlet.  Further actions have also been progressed: Work continuing to secure a site for creating additional Waste Transfer Station capacity.  Loughborough Waste Transfer Station and Recycling Household Waste Site reopened on Monday 10th December following improvement works.	medium/ amber
10. Pai		,	40		
C&FS	10.1	If the Local Authority and partners do not succeed in developing an inclusive culture across all schools, education providers and partner agencies	16 ( <b>New)</b>	This risk relates to building parental confidence. C&FS has developed a business case for significant investment in expansion of SEND provision and creation of new specialist SEND provision. This has been approved by Chief Officers and will strengthen medium term strategic planning.	Expected to move to green

(including the	
Parent Carer	
Forum), then it	
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ability of the	
'whole system' to	
meet the needs	
of the large	
majority of	
children with	
SEND in a	
mainstream	
school context.	

## Risk Management - general update

- 8. Risk management information and guidance has been loaded onto the Council's intranet enabling accessibility to all staff and ensure consistency in application.
- 9. The Managers' Digest (November 2018) provided information and guidance about risk management including managers' roles and responsibilities. The Managers' Checklist has also been updated to assist with the induction of new employees with responsibility for risk management.
- 10. Corporate data reporting now uses Tableau self-service dashboards. The Departmental Risk Registers and the Corporate Risk Register have been converted into dashboards on a regular basis and now form part of the Corporate Reporting tool.

### Risk Management Maturity Health Check Update

11. The independent health check by the Risk Management Partners (RMP) risk consultant was undertaken in October. They produced a draft report which overall is positive but recognises there are some issues and it suggests possible actions to address these. The draft report has been shared with all Chief Officers who will consider the report and the actions proposed in detail which will feed in to the review of the next Risk Management Strategy as detailed below. The report and the actions proposed will be reported to this Committee in May 2019.

### Risk Management Policy Statement and Strategy.

12. The Council's Risk Management Policy Statement and Strategy are reviewed annually and included as an appendix to the Council's annually updated Medium Term Financial Strategy. This year, the Policy Statement has been reviewed and revised to reflect significant local (i.e. proposals for a new council for Leicestershire) and nationwide (i.e. Brexit) developments. The revised Policy Statement is attached as Appendix B. In view of the timing of the RMP

- health check report outlined above, a detailed review of the Strategy has not yet been undertaken and it is proposed that this be delayed until the full detail of the RMP report can be properly considered.
- 13. A light touch review has established that the current Strategy remains fit for purpose and can therefore be included unchanged within the 2019/20 2022/23 MTFS which is to be considered by the Cabinet on 8<sup>th</sup> February and full Council on 20 February 2019. This will allow time for a full review to be undertaken during 2019, taking account of the improvements proposed and arising from the RMP health check.
- 14. Once the full review has been completed the refreshed Strategy will be presented to this Committee and thereafter will form part of the refresh for the next MTFS.

### **Insurance update**

### Municipal Mutual Insurance Limited

- 15. Since the last update to the Committee on 25 July 2018 the position of Municipal Mutual Insurance (MMI) remains stable with assets currently matched to liabilities. There has been no further requirement for reserve strengthening by way of an increase in the claims levy which currently stands at 25%.
- 16. The July update commented on the valuation of the reinsurance asset in MMI's accounts and how this would be affected by a change in the presentation and allocation of claims following a Supreme Court decision. In May 2018 'Equitas' (as the lead reinsurer) was granted the right to appeal the arbitration ruling in the Court of Appeal. The hearing is scheduled to be held on 18 March 2019 and so a further update should be available for the May 2019 Committee. Should the reinsurance case ultimately prove successful for MMI and further strengthen the balance sheet the possibility of an increase in the levy diminishes. The run off of claims is still in its early stages and the ultimate is not expected to be reached until around 2050.
- 17. In conjunction with the reinsurance case an investment strategy review is being undertaken. The current investment portfolio is made up of investments in highly rated, low risk assets. MMI's board is considering a change to the investment criteria to a less risk averse approach allowing investment in 'A' rated corporate bonds. An analysis of the potential additional return that might be generated through this change is being prepared by MMI's external investment managers. The timing of any change is also being considered in view of Brexit risk.
- 18. Following on from the above, the Council's fund set aside to address the failure of the MMI remains adequate. However, should the claims experience start to deteriorate through, for example, new heads of claim, changes in the law or the discovery of more institutional abuse dating back to the 1980's and beyond, a reassessment may need to be made. Any such deterioration should be identified early enough to allow sufficient lead in time to plan.
- 19. On a positive note, nationally the number of new claim notifications in respect of mesothelioma (exposure to asbestos) appears to have passed its peak.

However, this is offset in large measure by an increase in new abuse claim notifications. It is important to note that a key risk is the volatility of claims notifications as the liability tail unwinds.

## **Counter fraud update**

### Fraud Risk Assessment 2018/19

- 20. The CIPFA Code of Practice Managing the Risk of Fraud Corruption (the Code) recommends that local authorities identify and assess the major risks of fraud and corruption to the organisation. The Internal Audit Service performs a biennial fraud risk assessment and uses the results to direct anti-fraud resources accordingly. The County Council does not provide many of the services that have historically been considered to be at high risk of fraud, such as revenue and benefits. However, the change of emphasis from local government being a provider to a commissioner of services changes the risk profile of fraud, as well as the control environment in which risk is managed. More 'at arm's length' delivery of services by third parties, for example, contractors and external providers; and personal control of social care budgets, means that more public money is entrusted externally, which may impact on the wider control environment.
- 21. National fraud intelligence received through publications such as CIPFA's annual Fraud & Corruption Tracker (2018) and Fighting Fraud & Corruption Locally the local government counter fraud and corruption strategy (2016-19) help to inform local authorities of key fraud risks for councils and also of emerging frauds relevant to the sector. Such intelligence is used proactively to influence the fraud risk assessment. The Internal Audit Service also networks closely with other local authorities to share both fraud intelligence and strategies to manage fraud risks. As an example, the Internal Audit Service is an active participant in the Midland Counties' Fraud Group.
- 22. Appendix C attached to this report, contains a summary level of the fraud risk assessment, with a corresponding risk score for each area, based on the Council's overall potential exposure (impact on service delivery, finance and reputation and perceived likelihood). Scoring has been derived through discussions with individual service leads and departmental risk champions to give them the opportunity to consider whether scores remain reasonable or whether there have been any changes during the previous year that may lead to necessity to amend scores, e.g. known exposure to fraudulent activity, additional controls introduced; increased or decreased metrics/values etc. Recognising fraud in this manner ensures there is a comprehensive understanding and knowledge about those areas where potential fraud risk is the highest and the scale of potential losses. This in turn directs the Council's overall Anti-Fraud and Corruption Strategy and further allows the Council to direct counter-fraud resources accordingly. Consequently, this influences the internal audit annual planning process.

## Internal Fraud Communications to Staff

23. During the last quarter, the Internal Audit Service co-ordinated targeted internal communications to raise the awareness of fraud risk with Council staff. This coincided with International Fraud Awareness Week. This communication strategy enabled the Internal Audit Service to remind staff of key policies and procedures, the Council's whistleblowing process, the availability of the Council's fraud e-learning module and of good practice with regard to conflicts of interest. Internal Audit Service took further steps to inform staff of the Council's zero tolerance approach to fraud and financial irregularity and what that might mean in practice. As part of the process, the Internal Audit Service refreshed the information held on the intranet regarding fraud to ensure that it remains relevant and fit-for-purpose. The fraud communications also led to reminding managers of their responsibilities for operating a robust internal control environment within their service areas, e.g. effective segregation of duties in key processes.

## Serious & Organised Crime

- 24. In December 2016 the Home Secretary wrote to Council Leaders to discuss the threat from Serious and Organised Crime (S&OC) to publicly procured services in Local Government. The Home Office/DCLG had undertaken a pilot programme which has highlighted how local authority procurement is at risk of infiltration from S&OC. S&OC is far-reaching and includes terrorism, drug trafficking, human trafficking, child sexual exploitation, fraud and cyber-crime. The Internal Audit Service continues to do work to improve the Council's resilience to S&OC risk and during the last quarter undertook some targeted internal audit work in the following area:
  - Due-diligence surrounding the rental of County Council commercial premises, e.g. industrial units, systems and processes were found to be generally sound with only minor recommendations made.
    - Further work is currently underway in another area showcased by the Home Office to be at risk of infiltration from S&OC groups:
  - Taxis/private hire vehicle (PHV) contracts, e.g. home-to-school transport

### Counter Fraud "Doing the Basics Well" Audits

- 25. In response to the risk of fraud, the Internal Audit Service has undertaken short "doing the basics well" compliance audits in specific areas. During the last quarter, audit assignments were undertaken (or are currently ongoing) in the following areas:
  - Overtime
  - Travel claims
  - Supplier VAT number validation
  - Validation of VAT-only invoices
  - Imprest accounts
  - The link between the corporate induction process and raising fraud awareness with new staff

- Engagement of social care professionals (risks of employing staff on false qualifications)
- Declaration, and authorisation of, gifts and hospitality

### **Recommendations**

It is recommended that the Committee:

- a) Approves the current status of the strategic risks facing the County Council;
- b) Makes recommendations on any areas which might benefit from further examination and identify a risk area for presentation at its next meeting;
- c) Notes the updates provided on Risk Management general, Risk Management Health Check, insurance and counter fraud;
- d) Notes the revised Risk Management Policy Statement attached as Appendix B to this report, that the current Risk Management Strategy remains fit for purpose, and that both will be presented as an appendix to the 2019/20 – 2022/23 Medium Term Financial Strategy to the Cabinet on 8 February and full Council on 20 February 2019 for approval;
- e) Notes that the Risk Management Strategy will be reviewed in detail during 2019 taking account of the outcome of the RMP health check and that a further report on the outcome of that review will be presented to this Committee in due course.

### **Resources Implications**

None.

### **Equality and Human Rights Implications**

None.

### **Circulation under the Local Issues Alert Procedure**

None

### **Background Papers**

Report of the Director of Corporate Resources – 'Risk Management Update' – Corporate Governance Committee, 19 February, 13 May, 23 September and 25 November 2016; 17 February, 26 May, 22 September and 17 November 2017; 29 January, 23 April and 25 July 2018, 24 October 2018.

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# **Appendices**

Appendix A - Corporate Risk Register

Appendix B - Risk Management Policy Statement

Appendix C - Fraud Risk Assessment 2019