To:	Trust Board
From:	Medical Director
Date:	1 December 2011
CQC	Outcome 16 – Assessing and
regulation:	Monitoring the Quality of Service
	Provision

Title: UHL STRATEGIC RISK REGISTER AND THE BOARD ASSURANCE FRAMEWORK (SRR/BAF) 2011/12

Author/Responsible Director: Risk and Assurance Manager/ Medical Director

Purpose of the Report: To provide the Board with an updated SRR/BAF for assurance and scrutiny.

The Report is provided to the Board for:

Decision		Discussion	Х
Assurance	Х	Endorsement	Х

Summary / Key Points:

- The 2011/12 SRR/BAF has been updated to reflect changes made by the risk owners and incorporates issues identified at the November Trust Board and Audit Committee meetings.
- Two risks have an increased 'current' risk score these are: 'Deteriorating patient experience' (risk 8).
 - 'Management capability/ stretch' (risk 15).
- The SRR/BAF report will now be accompanied by an additional appendix to summarise month on month risk movement.
- The following risks are to be presented at the meeting for further scrutiny: 'Loss of liquidity' (Risk 6, Director of F&P).
 - 'Deteriorating patient experience' (risk 8, Chief Operating Officer).
 - 'IM&T Lack of IT strategy and exploitation' (risk11, Director of Strategy).

Recommendations:

The Trust Board is invited to:

- (a) review and comment upon this iteration of the 2011/12 SRR/BAF, as it deems appropriate, with particular reference to risk 6, 8 and 11.
- (b) note the actions identified within the framework to address any gaps in either controls or assurances (or both);
- (c) identify any areas in respect of which it feels that the Trust's controls are inadequate and do not, therefore, effectively manage the principal risks to the organisation meeting its objectives;
- (d) identify any gaps in assurances about the effectiveness of the controls in place to manage the principal risks; and consider the nature of, and timescale for, any further assurances to be obtained, in consequence;

Trust Board paper I

(e) identify any other actions which it feels need to be taken to address any 'significant control issues' to provide assurance that the Trust is meeting its principal objectives. **Previously considered at another corporate UHL Committee? Yes – Executive Team** Strategic Risk Register Performance KPIs year to date No Yes **Resource Implications (eg Financial, HR) Assurance Implications** Patient and Public Involvement (PPI) Implications **Equality Impact** N/A **Information exempt from Disclosure** Requirement for further review? Yes. Monthly at Executive Team meeting and Board meeting

UNIVERSITY HOSPITALS OF LEICESTER NHS TRUST

REPORT TO: TRUST BOARD

DATE: 1 DECEMBER 2011

REPORT BY: MEDICAL DIRECTOR

SUBJECT: UHL STRATEGIC RISK REGISTER AND BOARD ASSURANCE

FRAMEWORK (SRR/BAF) 2011/12

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1. INTRODUCTION

This report provides the Board with:-

- a) A copy of the SRR / BAF as of 24 November 2011 (appendix 1).
- b) A summary of risk movements from the previous month (appendix 2).
- b) A summary of changes to actions (appendix 3).
- c) Suggested areas for scrutiny of the SRR/BAF (appendix 4).

2. STRATEGIC RISK REGISTER/ BOARD ASSURANCE FRAMEWORK 2011/12: POSITION AS OF 24 NOVEMBER 2011

- 2.1 The 2011/12 Strategic Risk Register / Board Assurance Framework (SRR/BAF) has been developed using the risks set out by the Director of Finance and Procurement and progressed and extended by members of the Executive Team as the foundation of the document.
- 2.2 The SRR/BAF is updated on a monthly basis by the risk owners and is presented to the Executive Team on a monthly basis for consideration prior to submission to the Board. Following discussions at the Executive Team meeting and Audit Committee meetings on15 November 2011 the SRR/BAF has been amended to improve the accuracy and value of the document. Changes have been agreed by the risk owners and are highlighted in red.
- 2.3 Changes to the format of the SRR/BAF include the insertion of page numbers to provide easier navigation around the document and the change in title of 'net risk' to 'current risk'.
- 2.4 An appendix to show the risk exposure month on month will now be included with each SRR/BAF report to TB to provide an 'at a glance' summary document to assist TB members to focus on particular areas of concern.
- 2.5 Risk scores have remained static except for:
 - Risk 8 (Deteriorating patient experience) where both current and target risk scores have increased to 15 (high risk) and 10 (moderate risk) respectively to reflect a deteriorating position following recent national media reports concerning patient experience.
 - Risk 15 (Management capability /stretch) where the current risk score has increased from 16 to 20 (high risk).
- 2.6 A total of 16 actions were due to complete at the end of October 2011, of these 7 have been completed, 8 are partially complete and have had an extension to the deadline applied. Progress of 1 action is still to be determined at time of writing. A summary of changes to actions is shown at appendix 3.

- 2.7 A high level review of the SRR/BAF has been performed by Price Waterhouse Cooper (PWC) at the request of the Trust. The findings are summarised below.
 - a. 'Having a risk per page' is a good discipline.
 - b. Risk 15 requires further causes of the risk to be identified.
 - c. Some controls were identified as actions (i.e. listed as controls but not yet implemented).
 - d. Assurance on controls should identify how current they are, whether they have yet been received, and the regularity of the meetings where assurances are sought.
 - e. Positive assurances are not always presented in line with the assurance source.
 - f. There are a few examples of gaps in controls / assurances not being labelled (a) or (c) and in some cases the text does not line up making it harder to read and follow.
 - g. It may be helpful if actions that are not entirely within the Trust's control are identified to the Board.
 - h. Two examples were found where there was no action owner (since amended).
 - i. In instances where there are no actions to address gaps in assurance/ control these should be flagged

Points a, b, c, f, and h have already been addressed and remaining points will be addressed via the ongoing monthly updates from the risk owners in collaboration with the Risk and Assurance Manager.

- 2.8 The SRR/BAF is becoming detailed to such an extent that to achieve the 'risk per page' discipline whilst attempting to provide 'read across' is a challenge. It is suggested that risk owners should remove those controls and assurance mechanisms that are not of strategic significance (e.g. Daily sitrep, hourly ward rounds etc) in order to reduce the level of detail.
- 2.9 To provide regular scrutiny of risks on a cyclical basis a small number of risks will be selected at each meeting for Board members to review against the parameters listed in appendix 4. The following risks are forwarded for review:
 - 'Loss of liquidity' (Risk 6, Director of F&P). Risk score 25 (Extreme). 'Deteriorating patient experience' (risk 8, Chief Operating Officer). Risk score 15
 - 'IM&T Lack of IT strategy and exploitation' (risk_11, Director of Strategy). Risk score 16 (High).
- 3. Taking into account the contents of this report and its appendices, and the presentation by the Director of Finance and Procurement, Chief Operating Officer and the Director of Strategy respectively in relation to risks 6, 8 and 11, the Trust Board is invited to:
 - (a) review and comment upon this iteration of the SRR/BAF, as it deems appropriate, with particular reference to the risks above.
 - (b) note the actions identified within the framework to address any gaps in either controls or assurances (or both);
 - (c) identify any areas in respect of which it feels that the Trust's controls are inadequate and do not, therefore, effectively manage the principal risks to the organisation meeting its objectives;

- (d) identify any gaps in assurances about the effectiveness of the controls in place to manage the principal risks; and consider the nature of, and timescale for, any further assurances to be obtained, in consequence;
- (e) identify any other actions which it feels need to be taken to address any 'significant control issues' to provide assurance on the Trust meeting its principal objectives.

P Cleaver Risk and Assurance Manager 24 November 2011

PERIOD: 27 OCTOBER – 24 NOVEMBER 2011



STRATEGIC GOALS

- Centre of a local acute emergency network a.
- The regional hospital of choice for planned care b.
- C.
- Nationally recognised for teaching, clinical and support services Internationally recognised specialist services supported by Research and Development d.

Objective	Risk	Cause /Consequence	Controls	Current Risk	Assurance On Controls	Positive Assurance	Gaps in Assurance (a) / Control (c)	Actions for Further Control	Target Risk	Due Date	Risk / Action Owner
ac	1. Continued overheating of emergency care system	Causes: Lack of middle grade/senior decision makers Behaviour of new clinical commissioning groups Small footprint Delays in discharge efficiency Re-beds Delays in discharge to community beds Late evening bed bureau arrivals Consequences Clinical risk within ED Major operational distraction to whole of UHL Financial loss (30% marginal rate) Poor winter planning — inefficient/sub-optimal care Insufficient bed capacity Poor patient experience	Increased recruitment of revised workforce (including ED consultants / middle grade Drs) Frail elderly project in place LLR ECN Project Ward Discharge metrics in place CQUIN linked to in patient flow efficiency Emergency Care is a key theme for regular discussion at ET Representatives from Clinical Commissioning Groups will attend ET bimonthly re emergency care	5x4=20	Trust Board ECN Report Monthly Trust Board UHL report Q & P report ESIST report	Workforce changes progressing and new starters commenced Improving 4° Performance Improving position for: EDD Discharge before 13.00 Ward/board rounds	(c) Absence of an agreed action plan at present to: Divert attendances (c) fragility in ED performance (a) absence of assurance from partner agencies re: metric outcome (a) No clear metrics or accountabilities for EMAS performance c) No integrated strategy for UHL/LPT discharge and use of Community hospitals (c) ED capital expansion	LLR emergency plan to be implemented Development and agreement of a plan to: Divert attendances Reduce admissions via bed bureau Fund in a sustainable manner Need to agree at ECN common metrics for reporting across all stakeholders Identification of additional capacity if partner metrics do not achieve Capacity plan B if ECN does not meet metrics (ECN 'Lock-in' session scheduled for 22/11/11) Develop strategy via ECN Completion of capital expansion (as agreed by PCT) New Pathway projects in development	4×4=16	Dec 11 Nov 11 Review Nov 11 Nov 11 Jan 12 2013 2012/13	Chief Executive Chief Executive

	Risk	Cause /Consequence	Controls		Assurance	Positive	Gaps in	Actions for		Due	Risk /
Objective				Current Risk	On Controls	Assurance	Assurance (a) / Control (c)	Further Control	Target Risk	Date	Action Owner
a b	2. New entrants to market (AWP/TCS	Cause TCS agenda. (Elective care bundle/UCC). Impact of Health and Social Care Bill. – 'Any willing provider Financial climate.	GP Head of Service to help secure referrals and improve service quality. Review of market analysis – quarterly at F&P Committee.	4x4=16	GP Temperature Check. Completed in May 2011. F&P and Exec Team minutes on a	Improved services in areas that are important to our customers. Commissioner		Complete rigorous market assessment to clearly identify opportunities to create new markets and be the new entrants wherever possible	3x2=6	Dec 12	Director of Strategy
			, ,		quarterly basis where market share analysis has been discussed. Divisional and CBU	e.g. discharge letters	(a) Quarterly monitoring market gain/loss at Trust Board level.	Implement Quarterly market share reporting and impact analysis on Strategy at CBU, Divisional and Trust wide level.		Jan 12	Director of Comms
					market assessments and competitor analysis. Completed on an annual basis as part of the annual planning process.		(a) Further development of market share vs quality vs profitability analysis.	Develop a training plan for CBUs and contract leads for utilising market share data to inform strategy		Jan 12	Director of Comms
		Insufficient expertise for tendering at CBU or corporate	Market share analysis and quarterly report, linked to SLR / PLICS Clinical involvement in Commissioning.		Market share analysis reported to F&P Quarterly. Commissioning meetings.		(c) Systematic analysis of market share at Divisional and CBU Boards.	Develop clinical strategy that effectively responds to market analysis		Jan12	Director of Strategy
		level. Consequence Downside: Loss of market share, business, services and revenue. Increased competition from competitors Upside: Opportunities to develop partnerships and grow income streams.	Tendering process for services (elective care bundle & UCC). Links established with PCT Cluster regarding Elective care Bundle and discussions taking place with Planned care to ensure sufficient resources for a credible bid		Tendering meetings. Monthly meetings between CCGs and Exec Team		(c) Insufficient tendering expertise at CBU/corporate level	Review tendering expertise and ensure sufficient resource aligned to qualified opportunities identified in market assessment		Jan 12	Director of Strategy

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Objective	Risk	Cause /Consequence	Controls	Current Risk	Assurance On Controls	Positive Assurance	Gaps in Assurance (a) / Control (c)	Actions for Further Control	Target Risk	Due Date	Risk / Action Owner
a b c	3 Relationships with Clinical commissioning groups	Cause NHS reforms Requirement for clinical input into commissioning Weak relationships with GPs as result of historical lack of engagement by UHL Consequence Lack of certainty/ continuity of commissioning through transition CCG management capacity and capability during the transition Loss of revenue Lack of GP support for UHL strategy	Alignment of senior clinicians and executive directors to clinical commissioning groups Involvement of UHL clinicians in contracting round to provide consistency and expertise Joint working groups to develop key strategies	4x4=16	GP temperature check completed in May 2011. Notes from Account management structure with DDs and Execs (at least quarterly). Quarterly reports of market share to UHL Finance and Performance Committee Monthly Q&P reports monitoring discharge letter turnaround	Building clinician to clinician relationships through the LLR senate Proactive approach from GP consortia Clinical engagement with CCG chairs Improving customer care (e.g. OP letters project) Attendance of ET members at the Collaborative Commissioning Board	(a) Few examples we can point to of redesigned pathways (a) Difficult feedback through DeLoitte from CGCs and Cluster (c) No plan in place with LLR re long-term strategy linked to sustainability	Jointly develop LLR strategy Obtain PCT and CCG convergence with annual plan and IBP	3x3=9	Dec 12 Apr 12	Director of Strategy/ Director of Comms
			'LLR Clinical Senate'		Minutes from Clinical Senate (monthly)	GP input into readmissions and clinical coding projects					

Objec	Risk	Cause /Consequence	Controls	Current	Assurance On Controls	Positive Assurance	Gaps in Assurance (a) / Control (c)	Actions for Further Control	Target Risk	Due Date	Risk / Action Owner
Objective C d	4. Failure to acquire and retain critical clinical services (e.g. loss of services through specialist services designation including ECMO, Paediatric Cardiac Services, NUH as a level 1 major trauma centre)	Cause National Reviews of specialist services Potential 'snowball effect' Cost Effectiveness. Consequence Loss of key clinicians Inability to attract best quality staff Inability to achieve academic expectations Adverse outcome of further tertiary reviews Significant loss of income Upside: Retain local, regional and national profile, potential to grow services, improved recruitment and retention, increased R&D potential.	EMCHC Strategy and Programme Boards. Risks identified through business plans. Campaign to support paediatric cardiac services/repatriate services. Commissioner support and engagement. Major Trauma Network group established. ECMO NCG/Board engagement. Regular review by Exec Team & Trust Board. Strong academic recognition Joint planning with NUH re tertiary services	rent Risk 3x4=12	EMCHC reports & minutes (bi-weekly). Campaign response numbers. (Sept 2011). Feedback from public consultation. (Sept 2011) Major Trauma Network minutes & actions (quarterly). TB and Exec Team papers (monthly & weekly). ECMO costing analysis	ECMO contract in place. Campaign response results Lead co-coordinating centre/national training for ECMO. Leicester in highest scoring option for Safe & Sustainable 3 BRUS achieved in Sept 2011	(c) Do not have an agreed service profile for tertiary services	Marketing strategy for focus services we agree to develop Rigorous SLR analysis and business planning Ongoing dialogue with other children's cardiac centres to ensure strong proposal on sustainable network	get Risk 3x3=9	Dec 11 Jan 12 Dec 12	Director of Strategy Director of Strategy Director of Strategy

Objective	Risk	Cause /Consequence	Controls	Current Risk	Assurance On Controls	Positive Assurance	Gaps in Assurance (a) / Control (c)	Actions for Further Control	Target Risk	Due Date	Risk / Action Owner
ab	5. Loss making services	Causes: Inefficient services Poor use of clinical capacity Poor controls on pay resources Lack of innovation Poor SLR/PLICS position Lack of full PbR income Consequence: Risk of 'cherry-picking' of profitable services by commissioners Disinvestment of clinical services Recruitment challenges Missed efficiency opportunity — money wasted on inefficient services Impact on Trust's ability to deliver statutory targets (i.e. breakeven).	High level SLR analysis of service profitability Criteria for loss making services to be formally endorsed (no negative contribution post 2011/12, all services making 10% contribution to central overheads by end 2012/13) Review of each service line to identify position External benchmarking Targeted turnaround support introduced to focus on main loss making CBUs (Medicine, Cardiothoracic Surgery, Planned Care) External financial turnaround support	5x5=25	Monthly SLR/PLICS data Monthly pay expenditure reports SLR/PLICS presentations Internal audit review of RCI (PLICS) cost attribution methodology	Counting and coding changes Usage of PLICS (but uneven) Positive Internal audit review of annual RCI (PLICS) cost attribution methodology	(a) Still some underlying issues in data robustness (c) Major deterioration in 2011/12 forecast outturn due to losses in key CBUs. (a) Failure to deliver the forecast to date	Portfolio review in Q3 2011/12 Root cause analysis of systems issues causing data 'breakage' Set 2012/13 CIP targets based on PLICS/ SR position Transactional changes to incentivise behaviour External financial turnaround support External review of contract terms –by SHA	4X4=16	Nov 11. Dec 11 Run rates to be positive by end 2012/13. Nov 2013 Nov 2011	Director of F&P COO Director of F&P Director of F&P

Objective	Risk	Cause /Consequence	Controls	Current Risk	Assurance On Controls	Positive Assurance	Gaps in Assurance (a) / Control (c)	Actions for Further Control	Target Risk	Due Date	Risk / Action Owner
a b c d	6. Loss of liquidity	Causes Operating losses ytd Non standard contract Consequences Unable to invest in core services or develop new services Failure to deliver EFL statutory target	Updated internal liquidity plan Daily cash monitoring 12 month cash forecast SHA assistance in securing loan from NHS partners Internal liquidity plan	5x5=25	Weekly cash reporting Monthly reforecast	Maintaining positive cash balances Improvement in creditor days	(c) Lack of solution to structural lack of liquidity	Implementing rolling 3m cash forecast Response needed following Nov '11 pronouncement by Secretary of State re new	4X4=16	Now started – in Oct reporting cycle Report back in Dec 11	Director of F&P Chief Executive
			Restrictions to the UHL Capital Plan to generate cash Negotiations with suppliers			Finnamore review of cash and liquidity		criteria for financial assistance for pipeline FTs			

	Risk	Cause /Consequence	Controls		Assurance On Controls	Positive Assurance	Gaps in Assurance (a) /	Actions for Further		Due Date	Risk / Action
Objective				Current Risk	2 33 313		Control (c)	Control	Target Risk		Owner
a b	7. Estates issues Under utilisation and	Cause Lack of clear estate strategy since cancellation of Pathway Consequence	Service Reconfiguration Board established, with representation from all Divisions.	4x4=16	Minutes of Service reconfiguration board reported to Exec Team.	LLR Space Utilisation Review	(c) Lack of agreed UHL Estates strategy	Further develop UHL Estates Strategy	3x3=9	Apr 12	Director of Strategy
	investment in Estates	Sub-optimum configuration of services. The efficient provision of services in many areas is restricted by the physical	Governance for site reconfiguration now being expanded to include LLR implications and input.		All site / estate proposals are reviewed monthly by Site reconfiguration		(c) No Integrated LLR Estates strategy (linked to agreed clinical model, capacity	Develop an LLR Estates Vision in support of the clinical strategy.		Dec 11	Director of Strategy
		limitations of the buildings and by less than optimum clinical adjacencies.			Board. Service activity and efficiency	Good PEAT scores	and assets)	Agree LLR service configuration supported by most efficient use of estate		Mar 12	Director of Strategy
		Over provision of assets across LLR			performance monitoring reported monthly to FM Board.	Scores		Agree downsizing plans as part of LLR Estates Strategy.		Mar 12	Director of Strategy
					External audit of Estate by CAPITA reported to ET. Annual PEAT						
		Significant backlog maintenance Upside – Potential for asset disposal in medium to long term	£6 million per year allocated to reducing backlog maintenance		Scores Capital meeting notes & Capital Bids progress. UHL risk based replacement programme in place.			Target backlog to high risk elements on an annual basis, where there are greater consequences from a failure		Review Apr 12	Director of Strategy
		Downside scenario example – failure of electrical infrastructure	Planned Preventative Maintenance (PPM) schedules in place		PPM Performance reported to FM Board.						
			Emergency Planning & Business Contingency Plans in place for estates infrastructure failures		Testing programmes	Estates infrastructure failures dealt with effectively					
N.B	Action dates a	re end of month unless o	therwise stated								Page 8

0	Risk	Cause /Consequence	Controls	Current	Assurance On Controls	Positive Assurance	Gaps in Assurance (a) /	Actions for Further		Due Date	Risk / Action
Objective							Control (c)	Control	Target Risk		Owner
tive				Risk					sk		
b		Causes:	Monthly patient polling	5;	Patient experience	Improving polling	(c) Awareness of	Local awareness of LLR	5,	Nov 11	COO
	patient experience	Cancelled operations	Patient Experience plan and	x3=15	minutes	scores	urgent/emergency facilities for the	Emergency Care communication plan	x2=10		
		Poor communications	projects	01	Monthly Trust Board report	Increasing patients	public	Summary of patient)	Quarterly	COO
		Increased waiting times for elective and emergency patients	Caring @ its Best Divisional projects and dashboard		Real time patient feedback	experience results / feedback		experience feedback Review of patient		Dec 11	COO
		Poor clinical outcomes	Hourly ward rounds		Patient Stories	recuback		cancellations		Dec 11	000
		Lack of patient information	National Patient Survey		Patient Experience	Complaints					
		Poor customer service			data presented with patient safety and	reduction					
		Lack of engagement or	10 a sint alon		outcome measures			Introduction of Trust Working Group led by Rob		Commen ce Dec	Medical Director
		consultation Consequences	10 point plan Delivery of waiting times		Outcomes of 10 point plan reported to G&RMC (Sept			Sayer		11 review in 3 months	
		Patients not recommending or choosing UHL leading to	Theatre and out-patient		11) Quarterly theatre	Reducing patient	(c) Increasing	Introduction of emergency		Dec 11	COO
		reduced activity	transformation project		reports	cancelled operations	waiting time for treatment of	co-ordinator			
		Contract penalties	Review of patient cancellations		Divisional reports		surgical emergencies	Introduction of escalation thresholds		Dec 11	Clinical Director
		Reduced income from CQUIN monies	Engagement of Age UK, LINKS		Specialty Dashboard						(planned Care)
		Increased complaints	Clinical quality metrics		Clinical Effectiveness						
		Reputation impact	OPD/ED/Mat metrics		minutes Clinical Metric results						
			Focussed Divisional activity on key patient experience indicators		Q&P and Heat map report	Improving nursing metrics					
			Improved data analysis illustrating trends and prediction of key risk areas.		GRMC minutes						
			Promote successes across the organisation.								
N.	B. Action dates a	re end of month unless o	Engagement of consortia members and ECN for campaign therwise stated								Page 9

	Risk	Cause /Consequence	Controls		Assurance	Positive	Gaps in	Actions for		Due	Risk /
Objective	nisk	Cause /Consequence	Controls	Current Risk	On Controls	Assurance	Assurance (a) / Control (c)	Further Control	Target Risk	Date	Action Owner
b c	9. CIP requirement (driven by tariff)	Risk of Quality being compromised, increased clinical risk Failure to achieve statutory breakeven duties Risk of delay/failure of FT project with uncertain consequences thereafter	CIP plan for 2011/12 Pan-LLR QIPP plan Head of Transformation and project managers for pan-Trust CIP schemes External turnaround support (to Dec 12)	5x5=25	Internal audit review of sample of schemes Weekly metrics Monthly divisional C&C meetings	External reports confirmed scrutiny of C&C meetings (process)	(a) Lack of Project Management Office (a) Lack of consistent recording	Project Management Office to be established Quality assess all CIPs for impact on quality of care Deloitte and Finnamore supported review of 11/12 CIP schemes and M7 reforecast. Bridges into 12/13 planning	4X5=20	Nov 11 updated recovery plan Nov11 — updated divisional / CBU forecasts for 2011/12	Divisional Directors Director of F&P
							(c) Inconsistency in WTE of CIP reductions	Detailed workforce plan for 11/12 CIP programme		Nov 11	Director of HR
a b	10. Readmission rates don't reduce	Contract penalties Leakage of money from NHS to LAs if no agreement on reablement Opportunity cost of	Project board with representation from each division. Readmission action plans across all specialties	4x3=12	Monitoring of clinical project plans	Strong clinical engagement			4x2=8		
		readmissions e.g. less capacity Continuing risk of sub-optimal patient care	Regular reporting of readmission trajectory		Q&P report	Reduction in readmission rates	(c)Community readmission project not due to deliver until March '12	Closer working relationships required between project boards		Nov 11	Medical Director
			Community readmission Project LPT implemented support for ED		Community 'flash' scorecard monitored by Emergency Care Network and Medical Director		(c) Heavy dependence on Community Project board	Discussion with Commissioners on in-year use of reablement money		Nov 11	Director of Finance

	Risk	Cause /Consequence	Controls	31		Positive		Actions for		Due	Risk /
Objective				Current Risk	Assurance On Controls	Assurance	Gaps in Assurance (a) / Control (c)	Further Control	Target Risk	Date	Action Owner
a b	11. IM&T Lack of organisational IT exploitation	Causes Insufficient capacity and capability in IM&T Failure of NPfIT to deliver an integrated IT solution	Chief Information Officer Communications with internal and external stakeholders	4x4=16	CIO in post. IT strategy agreed by TB Nov 2011 implementation plan in place	MOC Completed LLR IM&T Delivery Board Minutes	(a) KPIs not reviewed outside IM&T	Outline Business case to be developed for future systems	3x3=9	Dec 11	Director of Strategy
		Organisational development has not focused on key IT skills and capabilities Lack of confidence in the delivery of benefits from IT	New structure and operating model for IM&T Programme and project plan discipline including benefits realisation.		Project management documentation		(c) Vacancies in IM&T operations	Recruitment to vacant posts		Nov 11	Director of Strategy
		Consequences Current systems complicated and disjointed leading to significant performance risk Majority of systems become	IM&T KPIs IT implementation plan IM&T Strategy Group		KPIs reviewed monthly by IM&T Board Minutes of IM&T strategy Group (quarterly)		(a) KPIs not benchmarked with other Trusts.	Review KPIs quarterly through Q&P and ensure this includes benchmarking		Mar 12	Director of Strategy
		obsolete or no longer supported by 2013/14 Major disruption to service if changeover not managed well Communications with partners			Daily Monitoring of help desk calls (reported monthly to IM&T Board)		(a) Help desk performance deteriorated due to increased vacancies	Procure IM&T Strategic Partner to increase capacity and capability		May 12	Director of Strategy
		is compromised IM&T unable to support transformation of UHL processes	Managed Service contract for PACS approved and in place.		PACS performance metrics (reported monthly to IM&T Board)	Incidence of PACS Failures reduced					
		Poor customer service from IM&T Insufficient commitment from clinical teams, with regard to training, to major IT projects causing delay to the projects	Business partners to work with the divisions and clinicians to improve communications and involvement		Delivery Board minutes (quarterly)						
		and the delivery of the identified benefits									

	Risk	Cause /Consequence	Controls		Assurance	Positive	Gaps in	Actions for		Due	Risk /
Objective				Current Risk	On Controls	Assurance	Assurance (a) / Control (c)	Further Control	Target Risk	Date	Action Owner
a b	12. Non- delivery of operating framework targets	Causes: External factors i.e. Pandemic Poor system management Demand greater than supply ability Inefficient administrative procedures Lack of clinician availability Consequences Patient care at risk Reduced choice – reduced activity Risk of Contract penalties Reduced income stream Poor patient experience Increased waiting times Failure to achieve FT Failure to meet MONITOR and CQC targets	Backlog plan Agreed referral guidance Identified clinician capacity Increased provision of capacity Access target monitoring as CIP's are implemented to ensure no impact. Review of bed allocation Staff recruited to support activity Transformational theatre project established (including dedicated theatre project lead) Ensuring efficient utilisation of theatres Transformational Outpatient project established Review of Out-patient management to support delivery of plan	3x4=12	Monthly 18/52 minutes RTT performance reports Monthly heat map report Monthly Q&P report HII reports Quality schedule/CQUIN reports Theatre Board progress report Monthly monitoring of theatre utilisation to theatre project Board OP project PID and minutes reported to Monthly contract meeting	Reducing patient waiting times evident Delivery of quality Schedule and CQUIN Achievement of RTT targets Improving theatre efficiency and performance	(c) Plans to deliver maintenance of backlog plan (Gen surg, ENT, Ophthalmic) (c) Diagnostic capacity for target maintenance c) Impact of new target delivery with network trusts (a)Capacity and capability for continued delivery	Proposed plan for contract meeting and work with Commissioners to provide a solution Review diagnostic capacity for Operating Framework delivery (Bowel screening)	3×2=6	Dec 11 Apr 12	COO/CN/Di v Manager CSD
		Deteriorating infection prevention measures	UHL Winter Plan UHL Infection Prevention Plan		Daily / weekly sitrep reporting Quarterly self assessment results reported to UHL IPC and PCT	Reducing level of CDT	a) Lack of evidence to demonstrate attendance of stat / Man training (requirement for NHSLA L2	Review compliance re medical Hand Hygiene training.		Dec 11	COO/CN/C BU Leads

Obje	Risk	Cause /Consequence	Controls	Current	Assurance On Controls	Positive Assurance	Gaps in Assurance (a) / Control (c)	Actions for Further Control	Target Risk	Due Date	Risk / Action Owner
Objective				Risk					Risk		
a b c d	13. Skill shortages	Cause Lack of development of a learning and development culture Lack of resource to invest in development opportunities	Appraisals for all staff Incorporation of Talent profile into UHL appraisal documentation Use of EMSHA talent profile Implementation of the Leadership and Talent Management Strategy	3x4=12	Monthly reporting of appraisal rates to TB Organisational Development and Workforce Committee Reports	Higher compliance with appraisal rates			2x4=8		
		Inability to recruit and retain appropriately skilled staff Consequence Lack of sustainability of middle grade rotas Quality compromised, increased clinical risk			Specific reports on area of particular shortage Analysis of reasons for joining/ leaving UHL	Recruitment of advanced nurse practitioners Steady increase in midwife numbers Nurse:bed ratio meets national compliance Recruitment of post-graduate	(a)Succession plan in development	Link workforce redesign to the development of effective patient pathways, to reduce requirement on difficult to recruit posts and / or make the posts more attractive		Quarterly update	Director of HR
		Compliance with external standards may be affected Additional expenditure on agency staff	Adherence to Divisional and Corporate Training Plans and continued development of alternatives models of training Continuing Professional Development Monitoring temporary staff expenditure		Training and Development plans monitored via TED group Monthly budget reports	Reduction in premium workforce	(c) Lack of development links with Trust partners (c) Gap in information regarding the training needs at divisional / directorate level	Continue to build strategic relationships with training partners Divisonal/ Directorate Leads to provide training needs information Continue to ensure compliance with both mandatory and statutory training requirements		Nov 11 Mar 12 Review Dec 11	Director of HR Divisonal Directors / Managers Director of HR
N.B	. Action dates a	High staff turnover rates re end of month unless o	therwise stated		Monthly Trust Board reporting on turnover rates Local Staff Polling /National staff survey	Consistently good turnover rate Improving national staff attitude and opinion results	(a) Need to understand the detail beneath the organisational figures are understood	Work with partners to address gaps in training plans, over recruit where required and take steps to make middle grade rotas more attractive (Finnamore and Deloitte)		Review Oct 11	Director of HR

Objective	Risk	Cause /Consequence	Controls	Current Risk	Assurance On Controls	Positive Assurance	Gaps in Assurance (a) / Control (c)	Actions for Further Control	Target Risk	Due Date	Risk / Action Owner
bc	14. Ineffective Clinical Leadership	Cause Inability to effectively implement Organisational Development Strategy Consequence Inability to responsively change service model to meet changing healthcare needs	Assistant Medical Director with responsibility for clinical engagement Contracts for CBU Medical Leads Medical Engagement strategy UHL Leadership Academy Adoption of NHS leadership framework Work with Warwick University on medical engagement Monthly CBU Medical Lead meetings GP engagement strategy	4x4=16	Medical Engagement survey (Warwick University) Review of Clinical Engagement Strategies at Organisation Development and Workforce Committee Reports to LLR 'Senate'	Well attended Medical Staff Committee meetings Structured New consultant program Strong clinical engagement with Transformation workstream Positive feedback from GP's	c) ME scale not yet repeated (c) Problematic communications with our clinical staff (a) No strong track record of confidence and experience of success in our medical leaders (c) No formal links with CGC agreed	Agree process for ongoing assessment of ME Implementation of plan to improve communication with our consultant body (consultant web-site, web accessible e mail) Develop links with organisations with successful track record. Participation in NHS leadership framework scheme Ensure secondary care representation on medical groups	4x2=8	Jan 12 Review of progress Dec 11 Feb 12 Jan 12 Jan 12	Medical Director Medical Director Medical Director Director of HR Medical Director of

			5	On Controls				4.0	_	
			Current Risk	Oil Controls	Assurance	Assurance (a) / Control (c)	Further Control	Target Risk	Date	Action Owner
15. Management Capability / stretch	Causes Lack of development opportunities	Leadership development and interventions Development and building of	5x4=20	Organisational Development and Workforce Committee Papers	Implement- ation of CBU structural changes	(a) Areas that are not improving based on survey results	Supplement internal resource with external capability where required	3x2=6	Review Dec 11	Director of HR
	Lack of experience and skills Staff do not understand the	organisational capacity and capability on processes to support service redesign		and reports	C .	(a) lack of	Clarify what is expected in terms of performance.		Dec 11	Director of HR
	environment we are transitioning into	Organisational development plan		Trust Board reports		alignment re: objectives	Ensure we have the right people in the right post with the right level of support		Six monthly results	Director of HR
	Environment	Exec led Workforce & OD group					Ensure our managers have the right training to fulfil their roles.		Dec 11	Director of HR
	Consequences Inability to support changes to service model						Increased Executive and NED accountability		Dec 11	Chief Executive
	Lack of focus on key metrics and service delivery	8 point Staff Engagement action plan		Local Staff Polling results	Improving Staff polling results	(a) Staff responses still poor	Consider ways to increase participation in staff polling including divisional targets		Jan 12	Director of HR
	leadership Inadequate organisational	Review of divisional structures to identify areas for development/ improvement					on participation			
	development	Appraisal and setting of stretching objectives aligned to the UHL Strategy		Monthly monitoring of appraisal levels in Q&P report	Appraisal rates good	(c) Ineffective succession planning	Develop effective succession planning for the '100'		Mar 12	Director of HR
				Monthly confirm and challenge exercise with divisions		(c) Lack of challenge and scrutiny of performance and quality at divisional	Skills capability review to be performed at divisional/ CBU level and reported to Workforce and OD Committee		Dec 11	Director of HR
		IMT strategy to support clinical service redesign					Develop a common definition for 'capability' and reflect in talent management profile		Jan 12	Director of HR
		Lack of experience and skills Staff do not understand the environment we are transitioning into Size of the challenge Environment Consequences Inability to support changes to service model Lack of focus on key metrics and service delivery Gaps in middle management leadership	Staff do not understand the environment we are transitioning into Size of the challenge Environment Consequences Inability to support changes to service model Lack of focus on key metrics and service delivery Gaps in middle management leadership Inadequate organisational development Inadequate organisational development Appraisal and setting of stretching objectives aligned to the UHL Strategy IMT strategy to support	Lack of experience and skills Staff do not understand the environment we are transitioning into Size of the challenge Environment Consequences Inability to support changes to service model Lack of focus on key metrics and service delivery Gaps in middle management leadership Inadequate organisational development Inadequate organisational development Appraisal and setting of stretching objectives aligned to the UHL Strategy IMT strategy to support	Lack of experience and skills Staff do not understand the environment we are transitioning into Size of the challenge Environment Consequences Inability to support changes to service model Lack of focus on key metrics and service delivery Gaps in middle management leadership Inadequate organisational development/ Inadequate organisational development Appraisal and setting of stretching objectives aligned to the UHL Strategy IMT strategy to support IMT strategy to support	Lack of experience and skills Staff do not understand the environment we are transitioning into Size of the challenge Environment Consequences Inability to support changes to service model Lack of focus on key metrics and service delivery Gaps in middle management leadership Inadequate organisational development Inadequate organisational development improvement Appraisal and setting of stretching objectives aligned to the UHL Strategy IMT strategy to support IMT strategy to support	Lack of experience and skills Staff do not understand the environment we are transitioning into Size of the challenge Environment Consequences Inability to support changes to service model Lack of focus on key metrics and service delivery Gaps in middle management leadership Inadequate organisational development Appraisal and setting of stretching objectives aligned to the UHL Strategy IMT strategy to support IMT strategy to support and reports and reports Trust Board reports Trust Board reports Coprorate alignment re: objectives (a) lack of Corporate alignment re: objectives Improving Staff polling results (a) Staff responses still poor Appraisal rates good (c) Ineffective succession planning (c) Lack of challenge and scrutiny of performance and quality at divisional level	Lack of experience and skills Staff do not understand the environment we are transitioning into Size of the challenge Environment Consequences Inability to support changes to service model Lack of focus on key metrics and service delivery Gaps in middle management leadership Inadequate organisational development Appraisal and setting of stretching objectives aligned to the UHL Strategy IMT strategy to support IMT strategy to support IMT strategy to support and reports Trust Board reports Trust Board reports Trust Board reports (a) lack of Corporate alignment re: objectives (a) lack of Corporate alignment re: objectives Ensure we have the right post with the right level of support Ensure we have the right people in the right operation in terms of performance. 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	Risk	Cause /Consequence	Controls		Assurance	Positive	Gaps in	Actions for		Due	Risk /
Objective	nisk	Cause /Consequence	Controls	Current Risk	On Controls	Assurance	Assurance (a) / Control (c)	Further Control	Target Risk	Date	Action Owner
b d	16. Lack of innovation culture	Cause Lack an innovation culture. Innovation seen as optional 'if we have time to spare'	Board level lead for innovation working with the SHA to further develop the NHS East Midlands Innovation Strategy	4x3=12	CBU & Divisional Business Plans. UHL projects funded through the	Success in last round of 2010/11	(a) Lack of a clear base line of current culture and future desired state.	Understand and remedy the factors that currently block innovation.	3x2=6	Review Dec 11	Director of Strategy
		Lack of support when developing new models Too focussed on immediate operational issues (firefighting)	UHL Transformation Programme to stimulate and drive an innovation culture within the organisation		Regional Innovation Fund.	Regional Innovation Fund 3 successful BRU	(a) Unclear uptake on others innovation.	Develop a systematic process for sharing, diffusion and adoption.		Review Dec 11	Director of Strategy
		Consequence Low staff morale Downside	Deloitte and Finnamore to help identify areas of innovation			applications	incentivised.	Establish clear mechanisms for incentivising innovation.		Mar 12	Director of Strategy
		Outmoded models of delivery increasingly expensive and vulnerable	Commercial Executive		Minutes of Commercial Executive (monthly)		(c) Lack of clinical engagement				
		Upside A health system that supports the spread and adoption of evidence-based innovative systems, products, practices	R&D Committee/ strategy		Minutes of R&D Committee (monthly)	Good clinical engagement with R&D Committee					
		and technologies.	PhD sponsored to examine how to successfully foster an entrepreneurial culture		Trans-formation Programme project plans and highlight reports (Bi-weekly Transformation Board)		(c) Inability to learn from others due to lack of opportunity to spend time outside of current issues	Continue to invite innovative organisations to share learning		Jan 12	Director of Strategy
					Ideas forum on InSite	Increasing number of ideas generated					

	Risk	Cause /Consequence	Controls		Assurance	Positive	Gaps in	Actions for		Due	Risk /
Objective		Cause / Control action		Current Risk	On Controls	Assurance	Assurance (a) / Control (c)	Further Control	Target Risk	Date	Action Owner
	17. Organisation may be overwhelmed by unplanned events	Cause Lack of sufficient capacity to deal with incidents causing a significant increase in admissions (e.g. major disaster, pandemic, etc) Industrial action Business continuity / disaster recovery plans not robust Failure of business critical systems (e.g. PACS) UHL Major Incident Plan becomes outdated and is not tested annually Consequences Poor patient experience. Trust reputation affected Inability to deliver required level of service Patient safety may be compromised Loss of income Failure to meet duties under the Civil Contingencies Act Delays to treatment of patients Loss of income Breaches of national targets	Corporate Policy. Multi agency working across Leicestershire. Major incident/business continuity/ disaster recovery and Pandemic plans for UHL/ wider health community. Dedicated project managers/leads for major incident planning. Incident command training for managers and clinicians. Counter Terrorist Awareness training Winter plan review 'Exercise Cameron' table top Daily Sitrep UHL Pandemic Working Group UHL Business Continuity Group Industrial action contingency planning Regular systems maintenance programmes IT systems redundancies and multiple backup servers Support from manufacturers of equipment	4x3=12	Review of MIPs and capabilities by EMSHA, LLR resilience forum, Leics City PCT, local clinical networks during 2011/12. SHA Critical Care surge plan review July 2011 SHA BCM review in 2010/11. Feedback from major incident exercises UHL self-assessment against core standard C24 Daily sitrep report Emergency planning and Business Continuity committee meeting minutes	Majax (fire) feedback from partner agencies SHA using UHL winter plan as an exemplar Feedback from Trust Decontamination Incident Compliance with C24	(a)Plans not all fully tested in real situations. (a)The UHL Major Incident Plan not fully tested. (a) Testing of Winter Plan	Continue work to develop UHL MIP and appendices via the Emergency Planning Committee Olympics preparedness exercise	3x3=9	Nov 2011.	COO/ Emergency Planning / Business Continuity Lead

Objective	Risk	Cause /Consequence	Controls	Current F	Assurance On Controls	Positive Assurance	Gaps in Assurance (a) / Control (c)	Actions for Further Control	Target Risk	Due Date	Risk / Action Owner
ive				Risk					sk		
abcd	18 Inadequate organisational development	Cause Lack of specific development programme for change management. Inadequate recognition of changes required to organisational culture and correlation between actions and effects on organisational culture. Low levels of Staff Engagement.	Organisational development plan Non- Exec led Workforce & OD group Staff engagement Strategy, local staff polling and national staff survey	4x3=12	Range of measurable success criteria reported to ET, Q&PMG and TB National / local Staff Survey Results	Increased % of staff satisfied in certain elements	(a) Larger no. of staff responses required.	Implementation of the staff engagement strategy and Leadership and Talent Management Strategy	3x3=9	Mar 12	Director of HR
		Board development knowledge based rather than skills based.	Board development programme		Reports to		(c) 2011 staff engagement 8 point plan not yet implemented (c) Board development	Implement 2011 staff engagement 8 point plan Increased emphasis on Board development		Review Mar 12 Dec 11	Director of HR Chief Exec
		Inadequate equipping of managers, leaders, staff for change.	Talent management / Leadership programme/ Clinical Leadership programme		Q&PMG, Workforce and OD Committee, and TB Reporting of projects and interventions as		content /structure requires revision (a) '100' talent profile not adequately	programme			
		Consequences Poor quality and efficiency of service to patients and service delivery	Performance monitoring via Trust Committees and intervention when necessary Divisional quality and		part of leadership programme	Increased No of staff performance managed.	discussed at appraisal (c) Lack of performance monitoring /				
		Poor Trust reputation Inconsistent behaviour against trust values	performance meetings Performance Excellence programme .		National survey and local polling results	Increased No of staff reporting a positive and valued appraisal	management at divisional levels (a) Inadequate evidence of change in behaviours (c) High volumes of complaints about staff attitudes/	Define the organisation- wide intervention to support embedding of values and behaviours		Dec 12	Director of HR
		Low staff morale	Greater reward / recognition (e.g. Caring at its Best Awards)				behaviour c) Lack of clinical leadership development	Develop and implement medical leadership programme		Mar 12	Director of HR
N.	B. Action dates a	re end of month unless o	2011 staff engagement 8 point plan therwise stated		National survey and local staff polling results		(c) Organisational values and behaviours not embedded	Define organisational approach in embedding UHL values and behaviours		Apr 12 Dec 12	Director of HR Page 18
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UNIVERSITY HOSPITALS OF LEICESTER NHS TRUST – STRATEGIC RISK REGISTER/ BOARD ASSURANCE FRAMEWORK 2011/12

Appendix 2

UHL STRATEGIC RISKS SUMMARY REPORT - NOVEMBER 2011

Risk No	Risk Title	Current Risk Exp (Nov 2011)	Prev Month Risk Exp (Oct 2011)	Target Risk Score and Final Action Date	Risk Owner	Comment
9	CIP Requirement	25	25	20 – Nov 11	Director of F&P	
5	Loss Making Services	25	25	16 - End of 2012/13	Director of F&P	
6	Loss of Liquidity	25	25	16 – Dec 11	Director of F&P	
1	Continued overheating of emergency care system	20	20	16 - 2013	Chief Executive	
15	Management Capability / stretch	20	16	6 – Mar 12	Director of HR	
3	Relationships with Clinical commissioning groups	16	16	9 – Dec 12	Director of Strategy	
7	Estates issues Under utilisation and investment in Estates	16	16	9 – April 12	Director of Strategy	
11	IM&T Lack of IT strategy and exploitation	16	16	9 – May 12	Director of Strategy	
14	Ineffective Clinical Leadership	16	16	8 – Feb 12	Medical Director	
2	New entrants to market (AWP/TCS	16	16	6 – Jan 12	Director of Strategy	
8	Deteriorating patient experience	15	9	10 – Dec 11	Chief Operating Officer	Target risk score also increased from previous month
4	Failure to acquire and retain critical clinical services	12	12	9 – Dec 12	Director of Strategy	
17	Organisation may be overwhelmed by unplanned events	12	12	9 – Nov 11	Chief Operating Officer	
18	Inadequate organisational development	12	12	9 – Mar 12	Director of HR	
10	Readmission rates don't reduce	12	12	8 – Nov 11	Director of F&P	
13	Skill shortages	12	12	8 – Mar 12	Director of HR	
12	Non- delivery of operating framework targets	12	12	6 – Apr 12	Chief Operating Officer	
16	Lack of innovation culture	12	12	6 – Mar 12	Director of Strategy	

UHL SRR/BAF SUMMARY OF CHANGES TO ACTIONS – NOVEMBER 2011

Risk No.	Action Description	Action Owner	Comment
1	Identification of additional capacity if partner metrics do not achieve.	Chief Executive	Partially complete. Deadline extended to end of November 2011.
1	Capacity plan B if ECN does not meet metrics.	Chief Executive	Deadline extended to end of November to take account of discussions at the Emergency Care Network 'lock-in' session scheduled for 22 November 2011.
6	Further negotiations with suppliers	Director of F&P	Completed. Now a control
8	Provide benefit realisation report of 10 point plan	Chief Operating Officer	Completed. Report provided to G&RMC September 2011. Now an assurance source.
8	Launch of Speciality Dashboard	Chief Operating Officer	Completed. Now an assurance source.
9	Quality assess all CIPs for impact on quality of care	Divisional Directors	Deadline extended to November 2011 and change of action owner (Divisional Directors).
9	Project Management Office to be established	Director of F&P	Deadline extended to November 2011 and change of action owner (Chief Operating Officer).
10	Further dialogue with Commissioners regarding definition of readmissions	Director of F&P	Complete.
10	Discussion with Commissioners on in- year use of reablement money	Director of F&P	This action has been raised but as yet there is no solution. Further discussions to take place on 28 November 2011. deadline extended to reflect this
11	Finalise and begin implementing IM&T strategy including an improvement programme for the short, medium and long-term	Director of Strategy	Complete. IT strategy agreed by TB Nov 2011 and implementation plan in place.
12	Review compliance re medical Hand Hygiene training.	Chief Operating Officer	Deadline extended to December 2011. Medical director and Infection Prevention Lead Nurse have met and identified a way forward.

UHL SRR/BAF SUMMARY OF CHANGES TO ACTIONS – NOVEMBER 2011

Risk No.	Action Description	Action Owner	Comment
13	Work with partners to address gaps in training plans, over recruit where required and take steps to make middle grade rotas more attractive (Deloitte and Finnamore)	Director of HR	No update available at time of report.
14	Develop contracts for CBU Medical Leads in order to be clear what is expected in terms of performance	Medical Director	Complete. Now a control.
15	Supplement internal resource with external capability where required	Director of HR	Deadline for review extended to Dec 11.
15	Increased Executive and NED accountability	Chief Executive	Deadline for completion extended to Dec 11.
17	Undertake UHL table top Winter Plan review (Directors and 3 rd tier)	Chief Operating Officer	Complete. Now a control.

AREAS OF SCRUTINY FOR THE UHL INTEGRATED STRATEGIC RISK REGISTER AND BOARD ASSURANCE FRAMEWORK

- 1) Are the Trust's strategic objectives S.M.A.R.T? i.e. are they :-
 - Specific
 - Measurable
 - Achievable
 - Realistic
 - Timescaled
- 2) Have the main risks to the achievement of the objectives been adequately identified?
- 3) Have the risk owners (i.e. Executive Directors) been actively involved in populating the SRR/BAF?
- 4) Are there any omissions or inaccuracies in the list of key controls?
- 5) Have all relevant data sources been used to demonstrate assurance on controls and positive assurances?
- 6) Is the SRR/BAF dynamic? Is there evidence of regular updates to the content?
- 7) Has the correct 'action owner' been identified?
- 8) Are the assigned risk scores realistic?
- 9) Are the timescales for implementation of further actions to control risks realistic?