To:	Trust Board
From:	MEDICAL DIRECTOR
Date:	30 AUGUST 2012
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: 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	X	Endorsement	X

Summary / Key Points:

- There will be a refresh of the SRR/BAF in conjunction with the Board on 1
 October 2012 in order to provide UHL with a fully revised 2012/13 version.
- Twelve actions due for completion in July have been completed. There are nine where the deadline has slipped to a later date.
- Three risks (5, 10 and 17) have reduced to the level of their previously identified target risk score and are now closed.
- The current and target risk scores associated with risk 15 have reduced and the target score associated with risk 19 has also reduced.

Recommendations

Taking into account the contents of this report and its appendices the 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.

Paper K

Strategic Risk Register Yes	Performance KPIs year to date No
Resource Implications (e.g. F N/A	Financial, HR)
Assurance Implications	
Yes	
Patient and Public Involvement	ent (PPI) Implications
Yes.	
Equality Impact	
Equality Impact N/A	
Equality Impact N/A Information exempt from Dis	closure
Equality Impact N/A	closure
Equality Impact N/A Information exempt from Dis	

UNIVERSITY HOSPITALS OF LEICESTER NHS TRUST

REPORT TO: TRUST BOARD

DATE: 30 AUGUST 2012

REPORT BY: MEDICAL DIRECTOR

SUBJECT: UHL INTEGRATED STRATEGIC RISK REGISTER / BOARD

ASSURANCE FRAMEWORK (SRR/BAF) 2012/13

1. INTRODUCTION

1.1 This report provides the Board with:-

- a) A copy of the SRR / BAF as of 31 July 2012 (appendix one).
- b) A summary of risk movements from the previous month (appendix two).
- b) A summary of changes to actions (appendix three).
- c) Suggested areas for scrutiny of the SRR/BAF (appendix four).
- 1.2 There will be a refresh of the SRR/BAF in conjunction with the Board to provide UHL with a fully revised 2012/13 version. An externally facilitated Board development session is arranged for 1 October 2012 and an agenda for the session will be circulated during September.

2. SRR/BAF 2012/13: POSITION AS OF 31 JULY 2012

- 2.1 The SRR/BAF is updated by the risk owners and is presented to the Board on a monthly basis. Changes are highlighted in red in appendix one.
- 2.2 Twelve actions due for completion in July have been completed. There are nine actions where the deadline has slipped to a later date (see appendix three for details).
- 2.3 Three risks have achieved their target risk score and are now closed and removed from the SRR/BAF. These are:
 - Risk 5 Lack of appropriate PbR income
 - Risk 10 Readmission rates don't reduce
 - Risk 17 Organisation may be overwhelmed by unplanned events
- 2.4 The current and target risk scores associated with risk 15 have reduced reflecting additional controls in place and the target score associated with risk 19 has reduced reflecting the identification additional actions for further control.
- 2.5 To provide regular scrutiny of strategic risks on a cyclical basis Board members are invited to review the following risks against the parameters listed in appendix four.
 - Risk 6 'Loss of liquidity'. Previously presented to the Board in December 2011.

- Risk 14 'Ineffective clinical leadership'. Previously presented to the Board in January 2012.
- Risk 16 'Lack of innovation culture'. Previously presented to the Board in February 2012.

3. Recommendations

- 3.1 Taking into account the contents of this report and its appendices, and the presentation by the Director of Finance and Procurement, Medical Director and Director of Strategy in respect of risks 6, 14 and 16 the 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 22 August 2012

PERIOD: 1 JULY 2012 – 31 JULY 2012



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 (Cross reference to risk 17)	Causes: Lack of middle grade/senior decision makers Effectiveness in reducing the numbers presenting at ED Lack of bed capacity and critical care capacity 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 and penalty costs) Poor winter planning — inefficient/sub-optimal care Insufficient bed capacity in particular on AMUs Poor patient experience	Increased recruitment of revised workforce (including ED consultants / middle grade Drs) Frail elderly project in place 'Right Time, Right Place' initiative LLR emergency Plan LLR ECN Project Ward Discharge metrics Common metrics for reporting across all stakeholders CQUIN linked to in patient flow efficiency Emergency Care is a key theme for regular discussion at ET Representatives from Clinical Commissioning Groups attend ET bimonthly re emergency care Actions associated with recent trust bed capacity risk assessment	4x4=16 Business/Patients	Daily /weekly ED performance Trust Board ECN Report Monthly Trust Board UHL report Q & P report ESIST report	Workforce changes progressing and new starters commenced Significantly improved ED 4 hour 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 (c) 'Right Time. Right Place' not effectively controlling all risks (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	External review of emergency care processes (Kings College) Increased flexibility plans to be developed Job Plan review to be undertaken Introduce ED referral pathway to next day clinics Respond to recommendations of the July ECIST report Completion of capital expansion (as agreed by PCT) New Pathway projects in development	3x4=12	Aug 2012 Nov 2012 Aug 2012 Aug 2012 Sep 2012 2013	Chief Executive Chief Executive COO/ Medical Director COO COO Chief Executive Chief Executive

	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
ab	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. Insufficient expertise for tendering at CBU or corporate level. Consequence Downside: Loss of market share, business, services and revenue. Increased competition from competitors Upside: Opportunities to develop partnerships and grow income streams.	GP Head of Service to help secure referrals and improve service quality. Review of market analysis – quarterly at F&P Committee. Rigorous market assessment to clearly identify opportunities to create new markets Market share analysis and quarterly report, linked to SLR / PLICS Clinical involvement in Commissioning. Tendering process for services (elective care bundle & UCC). Links established with PCT Cluster regarding Elective care Bundle Tendering expertise reviewed for major procurements. Programme team with relevant resources agreed established to support Elective Care Bundle; external support agreed for other major procurements as required.	4x3=12 Business	GP Temperature Check. Completed in May 2011. F&P and Exec Team minutes on a quarterly basis where market share analysis has been discussed. Divisional and CBU market assessments and competitor analysis. Completed on an annual basis as part of the annual planning process. Market share analysis reported to F&P Quarterly. Commissioning meetings. Tendering meetings. Monthly meetings between CCGs and Exec Team Project team established to lead response to Elective Care Tender.	Improved services in areas that are important to our customers. Commissioner e.g. discharge letters	(a) Quarterly monitoring market gain/loss at Trust Board level. (a) Further development of market share vs quality vs profitability analysis.	Draft clinical Strategy completed further work identified to be completed. To be signed off by the Trust Board in August. Respond to next steps regarding Elective Care Tender.	3x2=6	Aug 2012 Oct 2012.	Director of Strategy

Objective	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
ctive				Risk					isk		
b	relationships with Clinical	Context New Health act; competition/ collaboration &partnership contract Cause 1. Weak relationships with GPs as result of historical lack of engagement by UHL 2. Lack of understanding / trust between UHL leaders and CCG leaders 3. Lack of evidence of pathway redesign		4x4=16 Business					3x3=9		
		Consequence 1. High levels of GP (customer) dissatisfaction with UHL services. > loss of market share / revenue > lower hurdles for competition	GP Head of Service GP relationships action plan part 2 GP value added > training / Podcasts Getting the basics right > GP Hotline		GP temperature check (part 3) in May 2012. Informal feedback from GPs re: Guide / hotline / letters	GP temperature Check part 2 +ve	Temperature check (part 3) results in June 12 Anecdotal feedback on new initiatives	Fully developed plan for ICE / Transcription interface		Sep 2012	Director of Comms
		> No grass root support from GPs regardless of strength of CCG leader relationships.	GP Referrers Guide OP letters 20+ services now transmitting electronically Discharge letters within 24		CCG funding = £285k for letters &	20 services now transmitting	All letters transmitted	Analyse and plan intervention to restore share.		Sep 2012	Director of Comms
			hours GP newsletter		GP hotline 1/4rly Market share analysis to F&P	Market share stable across	Ophthalmology first GP referral –ve 9%	Be the successful bidder for the East Leicestershire & Rutland CCG.		Dec 2012	Director of F&P
		Consequence 2. 2. Breakdown in key relationships with commissioning decision	Re-alignment of senior clinicians and executive directors to clinical commissioning groups		CCIG monthly meeting	most services CCG sign off of 12/13 AOP CCIG minutes	ENT -ve 12%	Shared understanding and monthly measurement of key metrics between CCGs and UHL		Sep 2012	COO
		makers. > Integration / pathway redesign harder > Contract negotiation over 'transformation' > Reputation	Involvement of UHL clinicians in contracting round to provide consistency and expertise		LLR Reconfiguration Board	CCG (agreement to 12/13 contract and C&C changes)					
			Joint working groups to develop key strategies Event to welcome CCG Lay			Agreement of LLR Reconfig' joint vision and principles					
N.	B. Action dates a	re end of month unless o	board members therwise stated							Page	4

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
	3 (continued)		CCIG Right care Transformation			Emergency Gynae pathway Urgent medical clinics/ admission avoidance	Still few examples we can point to of redesigned pathways	Agree more services for rapid pathway redesign		Oct 2012	Director of Strategy

0	Risk	Cause /Consequence	Controls	Current	Assurance On Controls	Positive Assurance	Gaps in Assurance (a) /	Actions for Further		Due Date	Risk / Action
Objective				rent Risk			Control (c)	Control	Target Risk		Owner
c d	4. Failure to acquire and retain critical clinical services (e.g.	Cause National Reviews of specialist services. Sustainability.	EMCHC Strategy and Programme Boards. Risks identified through business plans.	4x5=20 Fir	EMCHC reports & minutes (bi-weekly).	ECMO contract in place.	Do not have an IBP with an agreed service profile for tertiary services.	Draft Clinical Strategy	3x3=9	Review Sep 2012	Director of Strategy
	loss of services through specialist services designation	Cost Effectiveness. Recommendation made by JCPCT to not designate	Campaign to support paediatric cardiac services/repatriate services.	nancial/ reput	Campaign response numbers. (Sept 2011).	Campaign response results		Draft IBP		Oct 2012	Director of Strategy
	including ECMO, Paediatric Cardiac Services, NUH	Leicester's Paediatric Cardiac Surgery Consequence Loss of key clinicians	Commissioner support and engagement. ECMO NCG/Board engagement.	ation	Feedback from public consultation. (Sept 2011) Major Trauma	Lead co- coordinating centre/national training for ECMO.		Achieve FT Status, which is critical for controlling own destiny and retaining / attracting critical services.		April 201 <mark>4</mark>	Director of Strategy
	as a level 1 major trauma centre, Elective Care Bundle)	Inability to attract best quality staff Inability to achieve academic expectations Adverse outcome of further	Regular review of key service reviews by Exec Team & Trust Board.		Network minutes & actions (quarterly).			Complete clinical and legal review of JCPTC decision on Paediatric Cardiac Surgery		Aug 2012	Director of Strategy
		tertiary reviews Significant loss of income Patient safety impacted in the short term. Impact on ECMO.	Strong academic recognition Ongoing dialogue with other children's cardiac centres to ensure strong proposal on		TB and Exec Team papers (monthly & weekly).	3 BRUS achieved in Sept 2011		Undertake lessons learnt review on Paediatric Cardiac Surgery Review		Aug 2012	Director of Strategy
		Upside: Retain local, regional and national profile, potential to grow services, improved	sustainable network Co-location of ENT with Children's Cardiac Services completed.		Quarterly Network Meetings			due to be reviewed nationally and ensure lessons learnt are applied		Apr 2013	Strategy
		recruitment and retention, increased R&D potential.	Initial response strategy agreed for Children's Cardiac Services		SLR Data in Business Plans						

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. Cumulative impact of 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 Negotiations with suppliers Rolling 3m cash forecast	4x5=20 Financial	Weekly cash reporting Monthly reforecast	Maintaining positive cash balances Discussion at DoH escalation meeting to review TFA confirmed that DoH medium term loan could be provided immediately pre authorisation as FT	(c) Lack of solution to structural lack of liquidity is incomplete until contractual / I&E position is stabilised.	Strategic funding request to M&E SHA to be linked to the FT application. Strategic bid for transition funding being prepared with LLR commissioners.	4X4=16	Linked to FT applicatio n	Director of F&P Director of F&P

Risk Cause /Consequence Controls Assurance Positive Gaps in Actions for											Risk /
Objective				Current Risk	On Controls	Assurance	Assurance (a) / Control (c)	Further Control	Target Risk	Due Date	Action Owner
a b	7. Estates issues Estates development strategy Investment in Estate	Cause Lack of clear estate strategy since cancellation of Pathway Consequence Sub-optimum configuration of services. Over provision of assets across LLR	UHL Service Reconfiguration Board established, with representation from all Divisions.	4x4=16 Business/ Finan	Minutes of Service reconfiguration board reported to Exec Team. Service activity and efficiency performance monitoring reported monthly to FM	LLR Space Utilisation Review All site / estate proposals are reviewed by Site Reconfiguration Board Good PEAT	(c) Lack of agreed UHL Estates strategy (c) No Integrated LLR Estates	Further develop UHL Estates Strategy	3x3=9	Review Oct 2012	Director of Strategy
		Significant backlog maintenance	Governance for site reconfiguration now expanded to include LLR implications and input.	cial	Board. Annual PEAT Scores	scores Capital Bid evaluation	strategy (linked to agreed clinical model, capacity and assets)	Agree LLR service configuration /downsizing supported by most efficient use of estate.		Review Sep 2012	Director of Strategy
			£6 million per year allocated to reducing backlog maintenance		UHL risk based replacement programme in place.	Maintenance Performance KPIs reported to FM Board Capital / backlog	(c) Backlog will take several years of investment to reduce.	Target backlog to high risk elements on an annual basis, where there are greater consequences from a failure.		Review Sep 2012	Director of Strategy
			Recruitment into vacancies			programme of works.	(c) Estates staffing & recruitment and retention issues.	Develop more staff into key roles		Oct 2012	Director of Strategy
	Unplanned utility Service Interruption	Failure of electrical, water, gas, steam, infrastructure Consequences Service disruption, clinical/operational risk increased.	Planned Preventative Maintenance (PPM) schedules in place Emergency Planning & Business Contingency Plans in place for estates infrastructure failures		Testing programmes	Estates infrastructure failures dealt with effectively	(c) Limited number of Authorised Specialist Services in-house				
	Delayed	Quality and / or cost issues	Planned project Progression, risks identified		Regular reviews	External scrutiny and validation	(c) External influences beyond UHL control, Economy, Political	Regular review of Programme Risk Log		Sep 2012	Director of Strategy
	implementation of LLR FM	Consequence Financial & operational. Potential efficiency losses.	Estates Vision in support of the clinical strategy.		Positive Gateway Review at level 3 completed.		initiatives, Activity / Income generation	Gateway Review at level 3 conducted July 2012 – Level 5 scheduled for FBC and contract award.		Dec 2012	Director of Strategy

	Risk	Cause /Consequence	Controls		Assurance	Positive	Gaps in	Actions for		Due	Risk /
<u>Q</u>				Current	On Controls	Assurance	Assurance (a) / Control (c)	Further Control	Target Risk	Date	Action Owner
Objective									t Ris		
Ve				Risk					*		
b	8.Deteriorating	Causes:	Patient Experience plan and	_	Monthly patient	Improving polling	(c) Lack of	Summary of patient		Quarterly	COO
~	patient experience	Cancelled operations	projects	1×3=	polling	scores	assurance regarding patient	experience feedback	2x3=	,	
	СХРОПОПОС	Poor communications	Local awareness of LLR Emergency Care	12 P	Monthly Trust Board report	Increasing patients	experience feedback		6		
		Increased waiting times for	communication plan	Patient	·	experience	processes				
		elective and emergency patients	Caring @ its Best	nts	Real time patient feedback	results / feedback		Review Net Promoter results identifying key		Aug 2012	DNS
		Poor clinical outcomes	National Patient Survey		Patient Stories			areas and ranking of scores for focus			
		Lack of patient information	Engagement of Age UK,		Patient Experience	Complaints	c) Expectations of patients regarding				
		Poor customer service	LINKS		data presented with patient safety and	reduction	care not being met				
			10 point plan		outcome measures						5110
		Overheating of emergency care system leading over	Divisonal action plans for		Net Promoter			Review volunteer roles within OP and ward areas		Sep 2012	DNS
		demand for AMU admissions.	wards not in top quartile for Net Promoter Scores		scores benchmarked with			Review patient information		Sep	DNS
		Lack of engagement or consultation	Emergency co-ordinator		other trusts within SHA Cluster		(c) Increasing waiting time for	relating to consent		2012	
		Consequences	Escalation thresholds				treatment of surgical				
		Patients not recommending or choosing UHL leading to	Theatre and out-patient		Exec and Non		emergencies				
		reduced activity	transformation project		Exec safety			Internal Maite Creve to be		NA a vatla lu . /	000
		Contract penalties	Cancellation validation Clinical quality and OPD/ED		walkabouts			Internal Waits Group to be established with key		Monthly/ In	COO
		Reduced income from CQUIN	metrics Improved data analysis		Quarterly theatre reports	Reducing patient cancelled		metrics		progress	
		monies	Engagement of consortia		Divisional reports	operations		Additional critical care capacity to be introduced		Review Oct 2012	COO
		Increased complaints	members and ECN for campaign		Specialty	Improving nursing metrics					
		Reputation impact			Dashboard	Successful					
			Clinical Audit rans areas		Clinical	Patient					
			Clinical Audit programme		Effectiveness minutes	Experience Conference May	() N				
			Internal wait group. Trolley monitoring process.		Clinical Metric results	2012	(a) No monitoring and reporting				
		. Failure to meet CQC	FTC flexible labour. Redirection of BB trolley		Q&P and Heat map report	Reduction in bed	system for internal standards				
		requirements.	patients. Extra capacity metrics.		Results from	capacity x 2 wards					
			, ,		clinical audit						
N.B	Action dates a	re end of month unless o	therwise stated		Dignity Audit outcomes					Page	9
					Metric outcomes						

Objective	Ohiective	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	9. CIP Delivery (previously CIP requirement)	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 2012/13 CIPs assessed for impact on quality of care Pan-LLR QIPP plan Transformation board Head of Transformation and project managers for pan-Trust CIP schemes	5x4=20 Financial	Internal audit review of sample of schemes Weekly metrics Monthly divisional C&C meetings Monitored monthly through F and P Committee and Confirm and challenge TSO now established	External reports confirmed scrutiny of C&C meetings (process) Further headcount reductions delivered	(a) Lack of consistent recording (c) Lack of headcount reduction in first cut 2012/13 CIPs Executive leadership on Transformation now assigned to Director of Strategy (June '12)	Development of transformational CIPs will continue into Q2 2012/13	4x4=16	Quarter 2 2012/13	Director of F&P

	Risk	Cause /Consequence	Controls		Assurance	Positive	Gaps in	Actions for		Due	Risk /
Objective		·		Current	On Controls	Assurance	Assurance (a) / Control (c)	Further Control	Target	Date	Action Owner
ecti									Risk		
/e				Risk					^		
a b	11. IM&T Lack of	Causes Insufficient capacity and capability in IM&T	Chief Information Officer Communications with	4x3=1	CIO in post. IT strategy agreed	MOC Completed	(a) KPIs not reviewed outside IM&T	Outline Business case to be developed for future systems	3x3=9	Next review Sep	Director of Strategy
	organisational IT exploitation	Failure of NPfIT to deliver an integrated IT solution	internal and external stakeholders New structure and operating	2 Busine	by TB Nov 2011 implementation plan in place	New Service Desk Team	(c) Vacancies in IM&T operations			2012	
		Organisational development has not focused on key IT skills and capabilities	model for IM&T Programme and project plan	SS	Project	Leader in post (secondment) – performance	(a) KPIs not benchmarked with other Trusts.				
		Lack of confidence in the delivery of benefits from IT	discipline including benefits realisation.		management documentation	Incidence of					
		systems Consequences Current systems complicated	IM&T KPIs reviewed as required via Q&PMG		KPIs reviewed monthly by IM&T Board	PACS Failures reduced					
		and disjointed leading to significant performance risk	IT implementation plan IM&T Strategy Group		Minutes of IM&T strategy	Delivery Board Minutes					
		Majority of systems become obsolete or no longer supported by 2013/14	UHL rolling programme of system/equipment replacement		Group (quarterly)	Managed Business Partner procurement moving forward		Award contract to IM&T strategic partner		Dec 2012	Director of Strategy
		Major disruption to service if changeover not managed well	1, 22		Daily Monitoring of help desk calls (reported monthly	3 1 41					
		Communications with partners is compromised	Maria and Coming and and		to IM&T Board) PACS performance						
		IM&T unable to support transformation of UHL processes	Managed Service contract for PACS approved and in place.		metrics (reported monthly to IM&T Board)						
		Poor customer service from IM&T	LLR IM&T delivery Board		Delivery Board minutes (quarterly)						
		Insufficient commitment from clinical teams, with regard to training, to major IT projects causing delay to the projects and the delivery of the identified benefits	Business partners to work with the divisions and clinicians to improve communications and involvement								
		35.5.10	Some vacant posts filled with short term contracts for essential services								
N.B	. Action dates a	re end of month unless o	therwise stated							Page	11

	Risk	Cause /Consequence	Controls		Assurance On Controls	Positive Assurance	Gaps in Assurance (a) /	Actions for Further		Due Date	Risk / Action
Objective				Current	On Controls	Assurance	Control (c)	Control	Target Risk	Date	Owner
ectiv				t Risk					Risk		
e				ş							
а	12. Non- delivery of	Causes:	Backlog plan	3 _X	Monthly 18/52 minutes	Reducing patient waiting times			3x2		
b	operating framework	External factors i.e. Pandemic	Agreed referral guidance Identified clinician capacity	4=12	RTT performance	evident			2=6		
	targets	Poor system management		Pat	reports Monthly heat map	Delivery of	c) Impact of new	Quarterly contract with		Quarterly	COO
		Demand greater than supply ability	Increased provision of capacity	ients	report Monthly Q&P	quality Schedule and CQUIN	target delivery with network trusts	referring Trust			
		Inefficient administrative	Access target monitoring as	/ repu	report HII reports	Achievement of	(a)Capacity and	Recruitment of CBU		Review	coo
		procedures	CIP's are implemented to ensure no impact.	ıtatio	Quality schedule/CQUIN	RTT targets	capability for continued delivery	Manager vacancies		Sep 2012	
		Lack of clinician availability	Review of bed allocation	n/ fin	reports		(c) impact of new	External audit overview of		Sep	COO
		Consequences Patient care at risk	Staff recruited to support	/ financial			operating framework targets	cancer pathway		2012	
		Reduced choice – reduced	activity	~			for 12/13	Identify and implement revised LOGI pathway		Aug 2012	COO
		activity	Transformational theatre project established		Theatre Board progress report		(c) impact of national bowel	, , , , , , , , , , , , , , , , , , , ,			
		Risk of Contract penalties	Ensuring efficient utilisation of theatres		Monthly monitoring of theatre utilisation	Improving theatre efficiency	screening targets				
		Reduced income stream	of theatres		to theatre project Board	and performance	(c) impact of national breast				
		Poor patient experience	Turn of a war ation all Outer ations				screening targets	Re-launch cancelled		Aug 2012	COO
		Increased waiting times	Transformational Outpatient project established		OP project PID and minutes reported to			operations guidance with RCA for non-compliance		2012	
		Failure to achieve FT	Review of Out-patient		Monthly contract meeting			Roll-out of capacity plan		Jan 13	DS
		Failure to meet MONITOR and	management to support delivery of plan		Daily / weekly			across specialities			
		CQC targets	UHL Winter Plan		sitrep reporting		(c) IP plan for 2012				
		Deteriorating infection prevention measures	UHL Infection Prevention Plan		Quarterly self assessment results	Reducing level of CDT					
			Ongoing review of		reported to UHL IPC and PCT	Increasing					
			compliance re medical Hand Hygiene training by CBU			numbers of medical staff					
			boards			receiving hand hygiene training					
		Lack of critical care capacity	Plans to deliver maintenance of backlog plan			(35% Jan 2012)					
			паппенапсе от раскод ріап								

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	13. Skill shortages	Cause No development of a learning and development culture No resource to invest in development opportunities Inability to release staff for education / training Inability to recruit and retain appropriately skilled staff	Use of EMSHA talent profile and incorporation into appraisal documentation Leadership and Talent Management Strategy Compliance with mandatory and statutory training requirements being monitored by Education leads Associate Medical Director for Clinical Education	3x4=12 HR /Patients	Monthly reporting of appraisal rates to TB OD and Workforce Committee Reports Specific reports to highlight shortage Analysis of reasons	Increased appraisal rate compliance Recruitment of advanced nurse practitioners Increase in midwife numbers	(a) Lack of regularised reporting on work to address targeted recruitment gaps (a)Succession plan still in development	Review of frequency/reporting lines for the work to address targeted recruitment gaps to ensure regular reporting Link workforce redesign to the development of effective patient pathways, to reduce requirement on difficult to recruit posts and	2x4=8	Dec 2012 Quarterly update	Director of HR Director of HR
		Consequence Lack of sustainability of some middle grade rotas Quality compromised, increased clinical risk Compliance with external standards may be affected Additional expenditure on agency staff	Productive strategic relationships and joint working with training partners. VITAL results have been collated and priority LBR modules for nursing / AHPs identified Adherence to Divisional and Corporate Training Plans and continued development		for joining/ leaving UHL Gaps and rota monitoring is reviewed by the Trust Medical Workforce Groups and services Training and Development plans monitored via TED group and education leads Monthly budget reports	Nurse: bed ratio meets national compliance Recruitment of post-graduate workforce Improvements in junior medical staff fill rates Partnership working between HEI / UHL commended by NMC Reduction in premium workforce Consistently good turnover rate	(c) Lack of engagement of clinicians. (a) Need to understand the detail beneath the organisational figures	/ or make the posts and / or make the posts more attractive Review of Deanery/ Trust funding of trainee doctor positions being reviewed at specialty level.		Review Oct 2012	Director of HR
N.E	3. Action dates a	High staff turnover rates re end of month unless o	of alternatives models of training Monitoring temporary staff expenditure		Monthly TB report on turnover rates Local Staff Polling /National staff survey	Improving national staff attitude and opinion results				Page	13

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
b c	14. Ineffective Clinical Leadership	Cause Inability to effectively implement Organisational Development Strategy Consequence Inability to responsively change service model to meet changing healthcare needs	Medical Engagement strategy UHL Leadership Academy Work with Warwick University on medical engagement GP engagement strategy Secondary care representation on CCG Participation in NHS leadership framework scheme Links continue to be developed with organisations with a successful track record. CCG commitment to develop clinical leadership within UHL	4x3=12 Business	Medical Engagement survey (Warwick University) Review of Clinical Engagement Strategies at OD and Workforce Committee Joint multi organisation clinically led working with LLR CCIG	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 clinical staff (a) No strong track record of confidence and experience of success in our medical leaders (c) No formal links with CGC agreed	Implementation of plan to improve communication with our consultant body (consultant web-site, web accessible e mail) Pilot of web based access Roll-out of technical solution if pilot is successful Releasing time for clinical leaders to engage constructively with CCGs	4x2=8 Business	Review of progress Sep 2012 Review Sep 2012 Dec 2012 Aug 2012	Medical Director Medical Director Medical Director Medical Director

	Risk	Cause /Consequence	Controls		Assurance	Positive	Gaps in	Actions for		Due	Risk /
2		Casco / Concoquento		Current	On Controls	Assurance	Assurance (a) / Control (c)	Further Control	Target Risk	Date	Action Owner
Objective							Control (c)	Control	et R		Owner
HVE				Risk					isk		
				Î							
á k	Management Capability /	Causes Lack of development opportunities	Leadership programme in place and communicated Engagement with	4x4=16	OD and Workforce Committee Papers and reports	Implementation of CBU structural changes	(a) Areas that are not improving based on survey results	Supplement internal resource with external capability where required	4x3=12	Review Oct 2012	Director of HR
(Lack of experience and skills	Leadership Academy programmes	Business			(a) lack of	Ensure the right people in		Six	Director of
		Staff do not understand the environment we are transitioning into	Talent management guidance	ness	Trust Board reports		Corporate alignment re: objectives	the right post with the right level of support		monthly results	HR
		Size of the challenge	Development and building of organisational capacity and					Ensure managers have the right training to fulfil their roles.		Review Oct 2012	Director of HR
		Environment	capability on processes to support service redesign					Integration of NHS		Review Oct 2012	Director of HR
		Consequences Inability to support changes to service model	Organisational development plan					Leadership framework within UHL		Oct 2012	пп
		Lack of focus on key metrics and service delivery	Exec led Workforce & OD group					Develop effective succession planning for the '100'		Dec 2012	Director of HR
		Gaps in middle management leadership	Skills capability review Mentoring and coaching		Local Staff Polling results	Improving Staff polling results	(a) Staff responses still poor	Strengthening of corporate		Oct 2012	Chief
		Inadequate organisational development	training for Medical Leaders		Local staff polling	Politing results	(c) Ineffective	directorate/ divisional infrastructure		0012012	Executive
			Annual business planning template including capacity and capability and leadership and governance		performance provided to Workforce and OD committee by Div Dirs		succession planning (c) Lack of challenge and	Review of leadership and talent management strategy as part of Organisational		Sep 2012	Director of HR
			8 point Staff Engagement action plan		Diis		scrutiny of performance and quality at divisional level	development plan refresh			
					Monthly monitoring of appraisal levels in Q&P report	Appraisal rates good					
			Review of divisional structures to identify areas for development/ improvement		Monthly confirm and challenge exercise with divisions						
N.	B. Action dates	are end of month unless o	Appraisal and setting of stretching objectives aligned to the UHL Strategy therwise stated							Page	15
			IMT strategy to support clinical service redesign								

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Object		Cause /Consequence	Controls	Current F	Assurance On Controls	Positive Assurance	Gaps in Assurance (a) / Control (c)	Actions for Further Control	Target Ris	Due Date	Risk / Action Owner
Cbjective k c c	16. Lack of innovation	Cause Lack an innovation culture. Innovation seen as optional 'if we have time to spare' Lack of support when developing new models Too focussed on immediate operational issues (firefighting) Consequence Low staff morale Downside Outmoded models of delivery increasingly expensive and vulnerable Upside A health system that supports the spread and adoption of evidence-based innovative systems, products, practices and technologies.	Board level lead for innovation working with the SHA to further develop the NHS East Midlands Innovation Strategy UHL Transformation Programme to stimulate and drive an innovation culture within the organisation Deloitte and Finnamore to help identify areas of innovation Commercial Executive R&D Committee/ strategy PhD sponsored to examine how to successfully foster an entrepreneurial culture Shared learning with innovative organisations	Current Risk 4x3=12 Business/ Financial	Assurance On Controls CBU & Divisional Business Plans. UHL projects funded through the Regional Innovation Fund. Minutes of Commercial Executive (monthly) Minutes of R&D Committee (monthly) Transformation Programme project plans and highlight reports (Bi-weekly Transformation Board) Ideas forum on InSite	Success in last round of 2010/11 Regional Innovation Fund Successful Experimental Cancer Medicine Centre application Opening of 3 new patient centred research facilities Successful application for BRU capital funding Good clinical engagement with R&D Committee Increasing number of ideas			Target Risk 3x2=6	Apr 2013 Nov 2012	
		the spread and adoption of evidence-based innovative systems, products, practices	PhD sponsored to examine how to successfully foster an entrepreneurial culture Shared learning with		Committee (monthly) Transformation Programme project plans and highlight reports (Bi-weekly Transformation Board) Ideas forum on	BRU capital funding Good clinical engagement with R&D Committee Increasing					

	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
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.	Organisational development plan Non- Exec led Workforce & OD group	4x4=16 Business/ Pation	Range of measurable success criteria reported to ET, Q&PMG and TB	Increased % of	(a) Larger no. of	Revision and	3x4=12	Sep	Director of
		Low levels of Staff Engagement.	Staff engagement Strategy, local staff polling and national staff survey	ents/Reputation	Staff Survey Results	staff satisfied in certain elements	staff responses required. (c) 2011 staff engagement 8 point plan not yet implemented	implementation of the staff engagement strategy and Leadership and Talent Management Strategy Creation and development		2012 Sep	HR Director of
		Board development knowledge based rather than skills based. Inadequate equipping of managers, leaders, staff for	Board development programme Talent management / Leadership programme/		Reports to Q&PMG, Workforce and OD Committee, and TB Reporting of		(c) Board development content /structure requires revision	of organisational development plan to support new strategy		2012	HR
		change. Consequences Poor quality and efficiency of service to patients and service delivery Poor Trust reputation	Clinical Leadership programme Performance monitoring via Trust Committees and intervention when necessary Divisional quality and performance meetings		projects and interventions as part of leadership programme	Increased No of staff performance managed.	(a) '100' talent profile not adequately discussed at appraisal (c) Lack of performance monitoring / management at divisional levels	Development of comprehensive leadership and development programme		Sep 2012	Director of HR / Director of CALA
		Inconsistent behaviour against trust values Low staff morale	Performance Excellence programme . Greater reward / recognition (e.g. Caring at its Best Awards)		National survey and local polling results	Increased No of staff reporting a positive and valued appraisal	(a) Inadequate evidence of change in behaviours (c) High volumes of complaints about staff attitudes/ behaviour c) Lack of clinical leadership development				
N.E	. Action dates a	re end of month unless o	therwise stated				(c) Organisational values and behaviours not embedded			Page	17

	Risk C.	Cause /Consequence	Controls		Assurance	Positive	Gaps in	Actions for		Due	Risk /
Objective	THON	ouuse / consequence	Controls	Current Risk	On Controls	Assurance	Assurance (a) / Control (c)	Further Control	Target Risk	Date	Action Owner
	19 Inadequate data protection and confidentiality standards	Cause Lack of compliance with existing data protection and confidentiality standards. Inadequate recognition of minimum standards required to protect patient and key corporate information. Limited levels of Staff Engagement and understanding despite previous training approaches.	Information Governance Steering Group and associated strategy work programme SIRO assessment as part of monthly performance review Caldicott updates for monthly performance plan Annual Information Governance(IG) Toolkit compliance assessment in March	4x3=12 Statutory/ reputational	Range of measurable success criteria including new KPIs reported to SIRO and ET, Q&PMG and IG Steering Group National / local IG Compliance Audit Results reported to appropriate committees	Increased % of staff trained in IG to required standards Increased no of audits highlighting sound compliance	(c) Large no. of staff not trained to updated DoH standards in IG (c) IG spot-checks audit plans not fully tested in real situations. (c) Limited clinical engagement	Ensure staff have updated methods for undertaking IG training to fulfil their roles. Strengthening of corporate directorate/ divisional information governance infrastructure Improve IG audit and performance reporting via IG Programme Board	4x2=8	Nov 2012 Nov 2012	Director of Strategy (SIRO) Director of Strategy (SIRO) Director of Strategy (SIRO)
abcd		Board compliance requirements knowledge based rather than skills based. Inadequate updating of managers, leaders, staff for managing personal information to compliance standard. Consequences Poor protection of highly sensitive personal data relating to patients and staff Damage to corporate reputation from data breaches Inconsistent behaviour against trust values Limited staff understanding	Staff IG training strategy, local staff cascade sessions and online resources Integrated IG training programme Performance monitoring via IG Steering Group and intervention when necessary Divisional quality and performance meetings to include IG items IG spot-checks for clinical and non clinical areas		Reports to Q&PMG, IG Steering Group, and SIRO reporting of projects and interventions as part of leadership programme	Decreased no of data breaches and other information incidents					

APPENDIX TWO

UHL STRATEGIC RISKS SUMMARY REPORT – JULY 2012

Risk No	Risk Title	Current Risk Exp (July 12)	Previous Risk (June 12)	Target Risk Score and Final Action Date	Risk Owner	Comment
9	CIP Delivery	20	20	16 – Quarter 2 12	Director of F&P	
6	Loss of Liquidity	20	20	16 – Linked to timescale for FT application	Director of F&P	
4	Failure to acquire and retain critical clinical services	20	20	9 – Apr 14	Director of Strategy	Action re FT timeline amended to April 2014
15	Management Capability / stretch	16	20	12 – Dec 12	Director of HR	Current risk and target risk score reduced in light of additional controls
1	Continued overheating of emergency care system	16	16	12 - 2013	Chief Executive	
18	Inadequate organisational development	16	16	12 – Sep 12	Director of HR	
3	Deteriorating relationships with Clinical commissioning groups	16	16	9 – Dec 12	Director of Comms	
7	Estates issues Under utilisation and investment in Estates	16	16	9 – Dec 12	Director of Strategy	Final date for actions amended to reflect FBC contract award date
8	Deteriorating patient experience	12	12	6 – Oct 12	COO	Deadline extended reflecting delays due to Commissioner consideration of temporary increases to capacity
19	Inadequate data protection and confidentiality standards	12	12	8 – Nov 12	Director of Strategy/ IG Manager	Further actions identified to reduce the likelihood of the risk occurring. Target risk score adjusted accordingly
14	Ineffective Clinical Leadership	12	12	8 – Dec 12	Medical Director	
5	Lack of appropriate PbR income (previously Loss making services)	12	12	12 – Sept 12	Director of F&P	Risk closed as target score achieved
11	IM&T Lack of IT strategy and exploitation	12	12	9 – Dec 12	Director of Strategy	
2	New entrants to market (AWP/TCS	12	12	6 – Oct 12	Director of Strategy	
13	Skill shortages	12	12	8 – Dec 12	Director of HR	
12	Non- delivery of operating framework targets	12	12	6 – Jan 13	COO	Deadline extended to reflect time required for capacity roll-out.
16	Lack of innovation culture	12	12	6 – Apr 13	Director of Strategy	
17	Organisation may be overwhelmed by	6	9	6 – Nov 12	COO	Risk closed as target score achieved

APPENDIX TWO

UHL STRATEGIC RISKS SUMMARY REPORT – JULY 2012

	unplanned events					
10	Readmission rates don't	8	8	8 – July 12	Director of	Risk closed as target
	reduce				F&P	score achieved

APPENDIX THREE

Risk No.	Action Description	Action Owner	Comment
1	Creation of emergency flow steering group	Chief Executive	Complete. The emergency flow steering group is in place and meets on a weekly basis with cross divisional representation
1	External review of emergency care processes	Chief Executive	Ongoing. The external review has not progressed due to commitments of the visiting team. However, there has been a further visit from ECIST who have provided an update on their findings to date. Date extended to August 2012
3	Empirical feedback on new initiatives	Director of Communications	Complete
3	Analyse and plan intervention to restore share	Director of Communications	Ongoing. Deadline extended to Sep 12.
3	Shared understanding and monthly measurement of key metrics between CCGs and UHL.	Chief Operating Officer	Ongoing. UHL/CCG meeting held. Acute metrics agreed on a shared document basis. For implementation September 2012. Deadline extended
4	Draft Clinical Strategy	Director of Strategy	Ongoing. Draft Strategic Direction document completed, and detailed clinical strategy in progress with completion date of end of September. Deadline extended to September 12
5	Increased team resources needed in PLICS team	Director of Finance and Procurement	Complete. The PLICS team has had temporary additional resource put into the team to ensure the monthly information produced is timely – this has been successful, as PLICS reporting is now on plan, one month in arrears.
			A permanent post has now been approved and is currently out to

APPENDIX THREE

	0.12 0.11		advert with interviews scheduled for week beginning 10
			September. We are expecting the successful candidate to be in post by the end of October.
6	Strategic bid for transition funding being prepared with LLR Commissioners	Director of Finance and Procurement	Ongoing The strategic bid for transitional funding was being prepared to support the Trust's liquidity position. The current cash balance of £31.7M at the end of July The timescale has now changed, with the Trust working with LLR partners in developing a health economy financial and economic model under the "Better Care Together" programme. This also supports our FT trajectory of having a revised IBP / LTFM complete by 31 October 2012.
7	Maintain a risk log for the project	Director of Strategy	Deadline extended to October 2012 Complete. Programme Risk Log reviewed &approved at the July Programme Board meeting – next review Sept 3rd 2012.
8	Undertake review of divisional Patient Experience Projects for GRMC/TB	Chief Operating Officer	Complete
8	Additional critical care capacity to be introduced	Chief Operating Officer	Ongoing. Discussed at contract meeting. Clinical meeting to be held between UHL and CCG colleagues. External review of critical care proposed by commissioners. In-year support for temporary increases to be considered by commissioners. Review date set for October 2012.
10	Clinically based audit in Q1 to establish baselines from which appropriate work streams will be determined for 2012/13	Director of Finance and Procurement	Complete. The clinical based audit has been completed, and draft outputs are awaited. A verbal update is planned for the Finance & Performance Committee on 29 August, with a full written report due to the Committee on 26 September.
12	Recruitment of CBU manager vacancies	Chief Operating Officer	Ongoing. Recruitment process in progress. Interview dates established. Action to be reviewed September 2012.

APPENDIX THREE

12	UHL review of bowel screening referrals	Chief Operating Officer	Complete. Clinical summit discussion held. Revised proposal submitted on 27 th July 2012
12	UHL plan to be drafted for Breast Screening implementation	Chief Operating Officer	Complete.
12	Identify milestones for Breast Screening target delivery through meeting with Commissioners, EMQA, Public Health, UHL	Chief Operating Officer	Complete. Milestones identified and on target for delivery. Phasing of recruitment progressed. Round length confirmed as delivered. Breast Screening Director delivered and support posts recruited.
12	Agree 2012 IP strategic objectives with quarterly monitoring at QPMG	Chief Operating Officer	Complete. 2012 plan submitted to GRMC. Quarterly QPMG monitoring .
13	Proactive steps being taken to address gaps in training for August, over recruit where required and take steps to make middle grade rotas more attractive	Director of HR	Complete.
13	Proactive steps being taken to address gaps in training for August, over recruit where required and take steps to make middle grade rotas more attractive	Director of HR	Action wording revised to reflect issues in relation to funding of Jr Drs.
14	Pilot of web-based access for email	Medical Director	Ongoing In a position, by the end of June, to start piloting the various options for connecting people to their email from outside the hospital. Further review of pilot September 2012
15	Integration of NHS Leadership framework within UHL	Director of HR	Ongoing. At the 25 June 2012 Workforce and OD Committee meeting agreement was reached on the requirement for 'UHL Manager Standards' in setting clear manager / leadership

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			expectations. The draft version was discussed at Staff Engagement Steering Group meeting on 6 August and agreement reached on further work required in finalising the standards. At update will be provided at the next Workforce and OD Committee Meeting (Sept 2012). Action to be reviewed Oct 2012
18	Review and revise 2011 staff engagement 8 point plan incorporating values and behaviours	Director of HR	Complete. Eight Point Plan has been successful in a number of areas e.g.: UHL remains in the top 20% of Acute Trusts for - % staff appraised in the last 12 months, staff with an appraisal and personal development plan in the last 12 months and also staff feeling valued by colleagues. In addition, UHL biggest increase in the National Staff Survey score related to Equality and diversity training. Linked to OD Planning a further review of the Eight Point Plan was undertaken at a Trust Board Time Out on the 1 st August. This confirmed that the themes are the same and agreement reached on how we now take these forward with specific actions. Some divisions / directorates have identified engagement champions and discussions have taken place (at several workshops) on local actions required in delivering improvements across the areas of the Eight Point Plan. This activity will be rolled out across all areas over coming months and will inform local staff engagement strategies (aligned to the Eight Point Plan).

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?