

## Corporate Risk Management at Leeds City Council

### Introduction

Leeds City Council provides a massive range of services to the people and city of Leeds, from social care to refuse collection, from managing local elections to processing benefits payments and from education to housing, to name but a few.

Given the importance, the diversity and the number of services we provide, it is essential that we recognise and manage the key risks that could threaten our organisation and the work that we do. Our corporate Risk Management Framework lays out processes and procedures to help us do this, resulting in the escalation of the most significant risks to a corporate risk register (CRR).

The CRR and the wider Risk Management Framework provide assurance to our customers, staff and elected members that we are aware of our biggest risks and that we have taken steps, as far as we can, to manage them. This means that they both less likely to occur and also have less of an impact if they did.

### Risk Management Process

All Council risks are identified, assessed and managed using a 6-step continuous process:



This process helps us to:

- Understand the nature of the risks we face.
- Be aware of the extent of these risks.
- Identify the level of risk that we are willing to accept.
- Recognise our ability to control and reduce risk.
- Recognise where we cannot control the risk.
- Take action where we can and when it would be the best use of resources.

We recognise that sometimes, the cost and time involved in managing the risk down to nothing would not be the best use of public money and we take this into consideration when developing our risk management action plans.

### Why have a Corporate Risk Register?

The information within the CRR is unsurprising and, indeed, can already be found in the public domain in reports and papers produced by the Council or external inspectors. But having it captured in one place means that a great deal of information on our key risks is brought together in a relevant and consistent way. This consistency means we can compare the different risks on a broadly like-for-like basis and by comparing them, we can identify which are the most significant and so which we need to focus attention and resources on. As risks are reduced, we can often downgrade them to be managed at a lower level of the organisation and so they are removed from the CRR.

## **What is a Corporate Risk?**

The Council's corporate risks can be roughly split into two types: those that mainly affect the City and people of Leeds and others that relate more to the way we run our organisation internally. An example of the first might include a major flood in the Leeds area or a breach in our social care responsibilities towards vulnerable people. An example of a more internal risk might be a failure to reduce our staff sickness levels.

The common factor in all of the risks identified in the CRR is that they are of sufficient importance to require the attention of our most senior managers and so all corporate risks are 'owned' by one or more of our directors who are charged with managing them.

## **Types of Corporate Risk**

The Council's corporate risks stem from a variety of sources, many of which are out of our direct control: for example, global events such as the economic downturn and climate change present immediate as well as long-term challenges as does the possibility of a 'flu pandemic. Closer to home, we often have to respond quickly to changes and targets imposed by central government and we must also recognise and meet the evolving needs of our citizens, communities and our own workforce.

Particularly at a time of growing financial pressures and the need to achieve more with less staff and a smaller budget, all of these factors contribute to the Council's risks.

## **Corporate Risk Assessment & Management**

Figure 1 below illustrates the risks on the CRR in May 2012 showing their relative ratings. Risk ratings are based on a combined assessment of how likely we think the risk is to occur and what would be its impact if it did. We use a consistent scoring mechanism to carry out this evaluation so that we can be sure our risks are all rated in the same way. When we evaluate the impact of a risk we consider the range of consequences that could result. These include the effects on the local community, any cost implications and whether the risk could affect our ability to meet central government targets or carry out our statutory and legal requirements.

You will see in Figure 1 that there are few risks in the lower half of the map and this is because risks with relatively low impacts in comparison to our corporate risks are managed at other levels of the organisation.

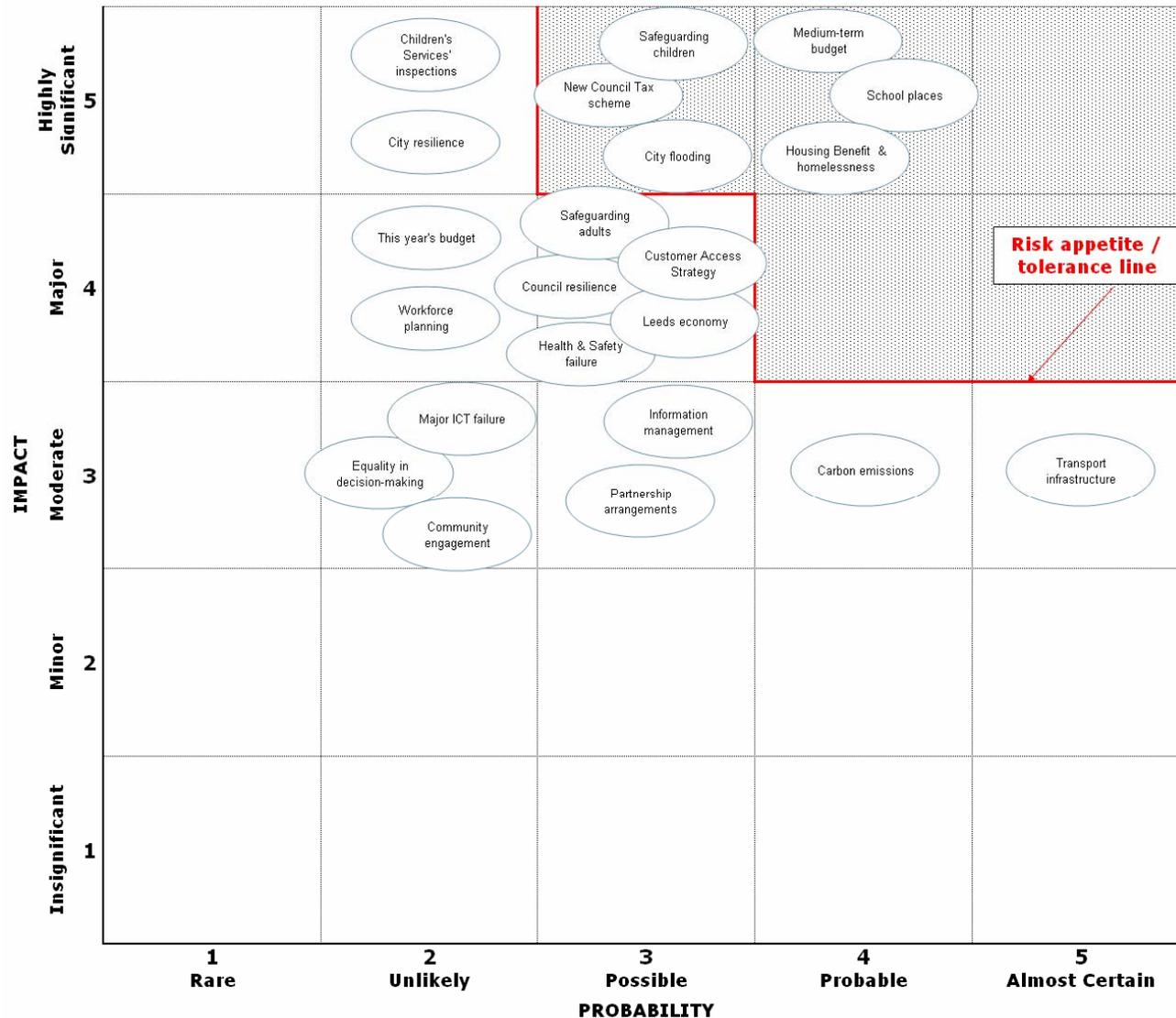
Action plans are in place for all risks in line with their ratings: i.e. the greater the risk, the more we try to do to manage it. We do accept, however, that some risks will always be somewhat out of the Council's control, such as a global or national 'flu pandemic, although what we can do is plan now to reduce the chances of its spreading further if it did happen.

The remainder of this document discusses the key risks highlighted in Figure 1 in more detail and outlines how the Council is managing them. Links to further information on each risk are provided.

## **Updating our Corporate Risk Register**

The CRR is a live document that is updated on an ongoing basis and formally reviewed each quarter. The register is continuously assessed against emerging risks and issues as identified through, for example, inspections and audits, consultation with our customers and staff and central government targets. It is also benchmarked against other organisation's corporate risk registers.

## Figure 1: Leeds City Council's Corporate Risk Map



## Safeguarding Children Corporate Risk Assurance

### Background

Local authorities have a legal duty to safeguard and promote the welfare of children. These duties fall within the remit of the Director of Children's Services under section 18 of the Children Act 2004.

Safeguarding and promoting the welfare of children covers protecting children from maltreatment, preventing impairment of children's health or development, and ensuring that children are growing up in circumstances that are consistent with the provision of safe and effective care. This is a very broad spectrum of duty, and this risk does not span the whole of this. The risk is specifically about child protection, which is activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

There is a subtle but important distinction to understand about how this risk applies to schools, and provision run by schools, such as children's centres. Some of the reasons why a child may come to harm as a result of abuse or neglect are similar in schools, as they are for children who are known to social care, for example because staff fail to identify or act on child welfare concerns, or because staff and/or governors are not appropriately trained in safe recruitment procedures.

Although the consequences of a child coming to harm are just as serious for a school as for a local authority, the controls that the local authority can put in place to reduce the likelihood of this risk occurring are different for schools than for council services. While the local authority can take steps to, for example, provide safeguarding training for staff and governors, ultimately it is governing bodies who are accountable for ensuring their school has effective child protection policies and procedures in place, that are in accordance with guidance issued by the Secretary of State, any local authority guidance and locally agreed inter-agency procedures.

### What are the risks?

The risk to the Local Authority is that a child who has been identified as being in need of support to promote their welfare, including having been identified as suffering from, or likely to suffer significant harm, is not adequately supported or protected and as a result they suffer further harm or their health and development is impaired. The factors which might contribute to this risk materialising are:

- Inconsistent approach to responding to identified concerns at an early stage; in particular the decreasing number of CAFs (assessments undertaken under the Common Assessment Framework – initiated by an agency where it is felt consultation with other agencies is needed but that a specialist assessment from social care is not required) being undertaken and the presentation of too many referrals to social care as being about child protection concerns when in fact they are about lower level child welfare concerns which do not immediately warrant social care intervention but tend to lead to the child receiving no support until their needs escalate to those of a child protection nature.
- A failure of agencies to adequately communicate information about the child's circumstances or to carry out actions agreed within the plan for the child.
- Private Fostering arrangements (those where the parent places the child with another person who is not a close relative without any involvement by social care) are not identified by agencies coming into contact with children residing in such arrangements and as a result these arrangements are not appropriately assessed and monitored.
- Caseloads of staff are excessive and result in insufficient time to properly oversee plans for children and ensure that they are effecting progress, alongside inadequate caseload supervision. This can lead to "drift" in ensuring that children's needs are met in a timely way.
- Inadequate systems in place to capture information about children at risk and to provide robust management information with which to identify areas of weak practice, insufficient capacity, issues in need of further investigation and action etc

The risk within a school environment is that a child comes to harm either because the school did not act appropriately to refer on concerns about this occurring, or because they did not identify that such a possibility existed for a child. The factors that could cause this risk to materialise within a school environment are:

- A failure to identify child protection concerns, caused by: poorly trained staff who do not recognise signs of neglect or abuse, lack of follow-up of poor school attendance, failure to follow appropriate protocols on transferring/receiving information about pupils who move schools; informally excluding pupils meaning that their whereabouts are not known; failure to comply with efforts to identify children who are missing education, etc.
- A failure to act on child protection concerns, caused by: poor communication within schools over the appropriate procedure to follow; lack of clarity about whose role this is within school; confusion over the appropriate threshold at which to refer concerns on, etc.

Primarily the consequences of these risks materialising would be to the child and their family which may be catastrophic in some cases where a child suffers serious harm or even death.

There could also be far reaching and serious consequences for the council in terms of significant press coverage, loss of reputation and confidence in Children's Services and poor assessment of our performance at inspections. The consequences would also lead to low staff morale, high staff turnover and sickness levels and difficulty recruiting staff to Children's Services which would in turn make improving services more difficult.

### How is the Council managing the risks?

Scrutiny Board (Children and Families) provides external scrutiny of Children's Services by elected members. There are also effective inter-agency working arrangements in place through the Children's Trust and the Local Safeguarding Children Board which also holds agencies to account for their practice.



A major re-structure of services has been implemented which has resulted in an integrated Children's Service which brings together resources and staff from previously separate services into one structure with unified leadership arrangements. This includes an Integrated Safeguarding Unit which brings all children's services safeguarding services together.

A number of initiatives are being progressed which will strengthen preventative and early intervention work in Leeds. Settings such as schools and children's centres have a role to play in the early identification of children who are suffering, or are likely to suffer significant harm, and also in early intervention with families:

- The newly created Early Help service works to ensure that children are safe in their homes by undertaking preventative work directly with families. Family support and parenting programmes for families experiencing difficulties are aimed at helping families to develop resilience and confidence, and to minimise the likelihood of some of the more chaotic and dysfunctional family circumstances arising that can be found in instances of abuse and neglect of children. In addition the service is leading on identifying children who are aged five or under and who have a child protection plan, and ensuring that their families receive children's centre services, in particular that 2 year-olds who are eligible receive their early learning entitlement.
- The Common Assessment Framework process is being simplified to concentrate on identifying and meeting the additional needs of children and families. This will enable families to have their needs assessed and met by universal or targeted services in more cases, and enabling the social work service to focus it's resource on those children and families in need of specialist support including working with families whose children are at risk of significant harm.
- Alongside this, structures for multi-agency working through locality and cluster arrangements are in place across the city. Multi-agency groups respond to requests from universal settings for support in meeting the needs of a vulnerable child or child with additional needs. A lead person is identified to progress a plan to meet the child's needs. Although these cluster groups are at different stages of development there are some excellent examples of positive outcomes for

children, young people and their families as well co-ordinated, effective support has been provided.

- The number of referrals to social care has increased significantly since 2008 and since the 2009 safeguarding inspection which led to a lowering of thresholds for referrals to social care. However, there has subsequently been concern that this has led to concerns about children being responded to through the formal child protection process in too great a proportion without giving proper consideration to the support services that might be provided to families at an earlier point. Significant research has been commissioned by Children's Services, the analysis of which has recently been shared and which confirms the concerns. A major exercise to implement the recommendations of this research is underway which will re-focus support to children prior to them reaching the threshold for formal child protection intervention. This should increase the capacity for social work teams to work with the most vulnerable children

In those circumstances where effective early intervention has not been able to adequately meet the needs of children and their situation is chronic or reaches crisis point various other services are in place to intervene appropriately.

- The Family Support Service has been re-commissioned to increase the focus on the most vulnerable children and families and to ensure a consistent service across the city. This service provides direct support to children and families within their home and support to access other services and includes specific support around factors which contribute to a child being at risk of significant harm such as poor parenting, offending, anti social behaviour, substance misuse.
- Family Group Conferencing is an internationally recognised approach which focuses on working with families to find solutions to their difficulties within their family and community networks with support and monitoring from agencies to ensure the child's safety.
- Multi-Systemic Therapy is an evidence based approach to working with families where early intervention services have not been able to meet the needs of children. Leeds has carried out a very successful pilot project working with 11-16 year olds at risk of coming into care or custody.
- The Integrated Safeguarding Unit which is now in place ensures that there is independent and robust oversight of children subject to a child protection plan and that lack of progress, poor quality practice or inter agency working is effectively challenged. In addition there is a formal supervision policy in place for all children's services staff ensuring that casework planning and scrutiny takes place in a structured and regular manner.

Caseloads of social care staff have been reduced through the recruitment to posts and a robust approach to tackling delays in progressing a child's case. Despite huge increases in referrals to social care, assessments are being carried out in line with statutory timescales in around 80% of cases which represents a 15 – 20% improvement over the 09/10 year. This means more vulnerable children are having their needs assessed in a more timely manner. Further improvements in social work caseloads can be expected when the early intervention initiatives described above begin to make an impact.

The procurement process to purchase a replacement for the ESCR (social care) case management and recording system is well advanced and on target to meet the intended milestones. This will improve the quality of recording in the Children's Social Work Service and thereby improve the ability to produce robust and timely management information to monitor performance and quality.

File audit programmes are in place within the Children's Social Work Service and the Integrated Safeguarding Unit which examines the practice of agencies in respect of children receiving a social work service and, in the case of the ISU audit, specifically focuses on a multi-agency view of the child protection plan and it's effectiveness in relation to specific children selected at random for audit. The Children's Social Work Service file audit programme has been in place for 8 months and is beginning to evidence improvements in practice standards.

Other ways of managing the risk that relate specifically to schools are:

- The fair access protocol, which ensures that vulnerable children are able to be transferred swiftly between schools and do not spend extended periods of time not on a school roll.

- A focus during governor training on governor responsibilities with regard to child protection.
- Schools represented on the membership of the Leeds Safeguarding Children Board (LSCB)

### **What more do we need to do?**

The proportion of children subject to child protection plans who are from ethnic minority families has been greater than would be expected from available population information for almost two years although there has been some very recent improvement in this situation. ONS population data on the ethnicities of the Leeds 0-18 population has not been updated since 2009 but the school age population data suggests an increase in the Leeds ethnic minority child population. This means that the extent of over representation of ethnic minority children subject to child protection plans may not be as great as it would appear.

National research concludes that there is little evidence to support the view that social workers or other welfare professionals operate different thresholds for groups from ethnic minorities when offering services or intervening in families. However, further work is to be undertaken to understand the situation in Leeds in greater detail.

Only a small number of children are identified each year in Leeds as living in a private fostering arrangement. Although all council services and partner agencies that may come into contact with children are provided with information advising them as to what constitutes a private fostering arrangement and what obligations parents and carers have to notify the council of such arrangements, it is thought that there may be more private fostering arrangements than we are aware of. This means that children may be living with adults who are not close family members without any checks or monitoring of that arrangement in place.

Although there has been a great deal of progress in developing cluster and locality structures to support vulnerable children and families before their needs escalate to the point of needing social work involvement there is still a considerable amount of infrastructure development ongoing. The 3 pilot clusters are naturally more established and are providing a good platform for others to build on. However, many clusters do not have the leadership capacity provided by the Targeted Services Leaders who have been in place in the pilot clusters. Resources which will provide for around 18 more Targeted Services Leader posts have been identified and these need time to establish.

Additional areas for development in cluster working include design and provision of a case management system and effective arrangements for information sharing about individual children. There is currently intensive efforts being made to implement the recommendations of Professor Thorpe relating to referral taking practice and the over categorisation of needs as child protection concerns. These plans are on track and will need careful monitoring as to the effectiveness of this approach in delivering the anticipated improvement in meeting children's needs earlier, reducing the amount of need which has escalated to child protection concern, and reducing the proportion of re referrals (that is children who are referred to the social work service who need to be referred again within a 12 month period).

Family Group conferencing is already operational in Leeds but is in the process of being expanded from one team to three teams.

Leeds has carried out a very successful Multi Systemic Therapy pilot project working with 11-16 year olds at risk of coming into care or custody and this service is to be expanded from one team to three teams. The multi systemic therapy service in Leeds has also been working with a voluntary sector organisation to implement a specific service for younger children where neglect is an issue. The partner organisation has recently withdrawn from the project due to funding issues and further work is ongoing to identify an alternative partner for this project.

### **Further information**

For further information please see the partnership website: <http://www.leedslscb.org.uk/index.htm>

The Leeds Safeguarding Children Board (LSCB) can be contacted on 0113-247-8578.

## Safeguarding Adults Corporate Risk Assurance

### Background

National guidance is in place to require each local authority Director of Adult Social Services to lead on partnership arrangements to oversee the protection of adults at risk of harm from abuse or neglect and the investigation of such allegations.

### What are the risks?

The range of risks that could impact on the City and on the Council relate to the reputational, legal and financial risk to the Council if the process is not followed fairly and thoroughly.

The impact on the Council would be a direct result of harm experienced by an individual adult at risk. This could range from an individual being mildly upset by how they are spoken to or treated, to very serious harm and/or ultimately death of one or more individuals due to neglect or violent abuse.

In each local authority area the Director of Adult Social Services (DASS) has a statutory role to ensure partnership arrangements are in place to manage safeguarding adults. In Leeds, as in most areas, this is managed through a Safeguarding Adults Board.

The safeguarding duty that the Council has for its vulnerable adults includes both the protection of adults at risk, and the investigation of allegations of abuse and neglect, in partnership with other statutory Board members, including, particularly, the police in the case of criminal abuse or neglect, and in many cases, NHS, Housing and Community Safety partners.

Reputational risk could materialise when individuals at risk or their families are not identified and suffer harm or are dissatisfied with either the protection or the thoroughness of the investigation. At the other end of the spectrum, people or organisations alleged to have caused harm can challenge the fairness and the thoroughness of the process.

Parties in both situations can make complaints, which can result in associated press coverage, ombudsman enquiries and even judicial review. Where a Council employee is the person alleged to have caused harm, the way its services are run can come into question. The implementation of Council HR policies can also be questioned. The potential consequence is the real risk of resources required to support the Council through legal action, and the cost of compensation to individuals who have been unfairly dealt with.

### How is the Council managing the risks?

The Leeds Safeguarding Adults Board was constituted in its current form in 2009, with a new memorandum of understanding, which has been kept under review each year. An independent chair was employed in October 2010, with the DASS reviewing the contract each year. The Board produces an annual report which is presented annually to the Council's executive members in July.

The Board has 6 sub-groups to oversee policy and procedure development, performance and quality assurance, training and workforce development, serious case reviews, communications and community engagement and the oversight of Mental Capacity Act (2005) requirements. The Board's work is supported by a partnership board support unit (hosted in Adult Social Care), specialist staff with relevant expertise, a safeguarding adults advice line, clear training, and robust policy and procedures, in both the partnership and the single agency domain.

The DASS is actively involved in the running of the Board, with scheduled, agenda'd meetings with the Head of Safeguarding Adults on a quarterly basis. The DASS and the executive member for Adult Social Care also have a programme of planned meetings with the independent chair of the Safeguarding Adults Board, and receive the papers for all Board meetings. This meeting structure enables both the DASS and the exec member to keep well versed in the business of the Board.

In addition to this, when there are risks of publicity around individual cases, or as a result of a commissioned service having a poor regulatory inspection, briefings are prepared for senior

managers and members, and press statements are proactively drafted in case the Council is asked for

When safeguarding adults serious case reviews are undertaken, the DASS has a personal involvement in signing off the overview reports, along with the independent chair of the Board and the chair of the Serious case review sub-group prior to them being presented to the Safeguarding Board for approval.



The Council's contribution to the Board membership includes senior officers from Adult Social Care, Housing, Community Safety, legal services and Children's services. There is close working across a number of strategic partnerships, specifically including the Health and Wellbeing Board and the Safer Leeds Executive. As part of keeping adults at risk of harm from abuse or neglect and their carers safe, there is a clear overlap with services to support victims of disability hate crime, antisocial behaviour, and domestic violence.

Adult Social Care undertake and co-ordinate most of the safeguarding investigations in Leeds. There are ten specialist senior practitioners (safeguarding and risk) who lead the operational staff in this work. This ensures that investigations and protection arrangements are overseen by professionally qualified, experienced social workers, who take personal and professional responsibility for their work, and for the continuous improvement of the work of others. Where individuals are unhappy with an investigation or the resulting protection arrangements, they can appeal under the Safeguarding Adults Contesting Decisions procedure, and have the case re-investigated or the case conference re-run.

Developments over the last twelve months across safeguarding have ensured that both a robust control environment is in place, in terms of policies, procedures and guidance for managing risk in Safeguarding, and that a complementary quality assurance system exists to assure compliance with that environment. Central to this is identifying risks to service users, carers, staff and others at an early stage and managing those risks rather than relying on remedial action after an abusive event. This work is led by Safeguarding Senior Practitioners (highly experienced social workers with a specialisation in safeguarding and risk who are located within teams) who operate across all areas of Adult Social Care linking with the full range of appropriate partner agencies. The Senior Practitioners work has included support, mentoring and advice on risk management and safeguarding to front line staff and, along with staff from the Performance and Quality Assurance team, direct work around legal responsibilities, case recording and the clarifying of responsibilities and accountability under duty of care, recording and managing risk all contributing to improvements in safeguarding.

In commissioned provider services, such as residential, nursing or home care, staff work very closely with the Safeguarding Senior Practitioners and partners to form a multi agency safeguarding quality assurance and monitoring process. The commissioning team have developed excellent relationships with a range of organisations from Environmental Health, Infection Control, Medication Governance team, Health and Safety Executive and others to provide specialist advice and support to providers when required. The commissioning team can, and do, suspend admissions to services in cases where this is deemed necessary due to an identified risk of harm, maintaining such suspension until improvements have been fully evidenced. A similar process is applied to our in house provision with principal unit managers, safeguarding practitioners and colleagues from partner agencies working closely together. The in house provision has a quality assurance framework in place that monitors closely any issues around safeguarding and risk. A further check is against information required by CQC which is monitored by the Performance and Quality Assurance team receiving all notifications sent by in house services to CQC, including safeguarding, and identifying and bringing to the attention of managers and the accountable individuals any concerns.

To ensure robust high quality risk management in protection plans we have placed risk centrally within the safeguarding process promoting a positive approach to risk rather than risk avoidance. A number of specific tools have been developed based on this approach balancing risk against the benefit to promoting service user outcomes by using innovative and minimally restrictive mitigation

strategies. This approach is embedded in the Risk Assessment and Management tool that has found favour with a range of partners including Health. This has resulted in the Risk Assessment and Management Tool currently being further developed into a multi-agency process that can be used by any safeguarding board partners.

Just as important as the control environment is assuring compliance with that environment. The safeguarding unit itself provides an assurance function for serious abuse and institutional abuse through the case conference process. Other forms of safeguarding investigations are quality assured by the Safeguarding senior practitioners to ensure a robust investigation has taken place and the lessons learned.

Safeguarding Case conferences are chaired by Independent Safeguarding and Risk managers employed directly by the Board. The case conference reviews the conduct and quality of the investigation the quality of any protection plan and invites all stakeholders including the alleged victim and perpetrator to attend and provides transparency and agrees the outcome, substantiated, not substantiated etc. The independence of the chairs provides an independent assurance on the process and provides verification of the outcome of the investigation. Each case conference gives rise to recommendations to protect and prevent reoccurrence the implementation of which is monitored by the senior practitioners to ensure completion of the action plans.

A Safeguarding Quality Assurance Framework has been developed by the board which is presently being implemented across the partners including Adult Social Care. This framework provides a consistent set of standards including risk management by which the quality of a safeguarding investigation can be consistently judged.

In addition to this a number of other audits of safeguarding have been undertaken looking for example at those referrals screened out of safeguarding, and separately decisions not to investigate, with work presently underway to understand some differences in conversion rates from referral to investigation, these are reported to the board via the performance and Quality Assurance sub group. The Adult Social Care Independent File Audit process this year will look at some 265 files including a large proportion that feature safeguarding and risk management. This is a follow on from the previous two years of audits which have evidenced a sustained and consistent improvement in the quality of safeguarding. This work is further supported by the developments in the case management system ESCR that allows detailed reporting and tracking around safeguarding, looking at individuals perpetrators and victims as well as across organisations allowing easier and faster audits of all aspects of a case, not just safeguarding, to provide assurance, identify areas of concern and target action as required.

The directorate management team receives monthly performance reports on safeguarding activity. The Board also has regular performance reports monitors its progress using a balanced scorecard approach. Part of this is to seek customer evaluation of the process as they experience it.

The numbers of safeguarding referrals for safeguarding investigations continues to rise year on year, with almost 3,500 in 2011/12. With increased awareness of the need for safeguarding adults services, following high profile cases such as those publicised by BBC's Panorama, comes the increased demand for justice for adults at risk of harm from abuse or neglect. This requires an increased number of staff to have the skills to investigate competently. This is a new skill set for some professionals in health and social care. To reduce the risk of poor investigations, and particularly poor investigation reports, in April 2012, the Board agreed a new procedural quality assurance framework, with clear standards and annotated template forms to ensure that staff know what is required of them in documenting their actions throughout the safeguarding adults process. The procedures have been revised and new training courses have been developed to complement the written guidance.

Across the Council, the corporate safeguarding policy, which covers both adults and children, requires each Directorate to have lead officers, who are trained in the recognition of both adult and child safeguarding, and in where to go to report it. These lead officers have been trained, and have received train the trainer training to ensure that they can train others in their directorate.

## **What more do we need to do?**

The new multi-agency procedures and quality assurance process now need to be thoroughly bedded in, through training and workshops.

A new programme of Quality Assurance Audit is being planned to check compliance with the new standards.

The Council's corporate policy and lead officer programme needs reviewing and revitalising as the register of lead officers has not been reviewed for some time, and staff turnover has led to some gaps.

West Yorkshire safeguarding adults partnership Boards are working together to develop a joint West Yorkshire policy and procedure for Adult Safeguarding. This will bring further requirements for training, but will aid our joint work with West Yorkshire-wide organisations such as police, ambulance, probation and fire services.

The national backdrop is expected to change as the Government introduces its anticipated draft bill on care and support. It is anticipated that Law Commission changes will be implemented putting adult safeguarding boards on to a statutory footing. In addition it is anticipated that the long-awaited Protection of Freedoms Bill will eventually be enacted, bringing its changes to the criminal records bureau checking system and the independent safeguarding authority. The world of safeguarding adults will have to be ready to adjust its policy and procedures to accommodate any changes.

## **Further information**

All procedures and forms can be seen on the Partnership website:

[www.leedssafeguardingadults.org.uk](http://www.leedssafeguardingadults.org.uk)

The Safeguarding Adults Partnership Unit can be contacted on 0113-224 -3511.

For further information, please contact Hilary Paxton, Head of Safeguarding Adults on 07545-604175, or by council email ([hilary.paxton@leeds.gov.uk](mailto:hilary.paxton@leeds.gov.uk)).

## School Places Corporate Risk Assurance

### Background

Leeds City Council has a statutory duty to ensure sufficiency of school places for all the children in its area of statutory school age.

During the 1990s there was a significant decline in the birth rate, nationally and locally. By 2001 there were falling numbers in Leeds primary schools and a growing number of surplus places across the primary sector.

From 2001 onwards, the number of births in Leeds started to increase. This trend is a national issue but is more pronounced in Leeds than in some other parts of the region and across the country; although a number of other authorities also face significant pressures. From just over 7,500 births in 2001 we have now had 10,000 or greater births in the last two academic years and expect similar for 2011/12.

The increase in the 0-5 population means that there is an increase in the demand for primary school places as these children reach school age. This has been addressed through expansions to existing schools from 2009 onwards, with new proposals developed each year in line with where the predicted demand will be, as the pressure for Reception places is not spread evenly across the city.

The changes to the primary age population are projected to impact on secondary place provision in 2015/16. Those areas that are currently experiencing the greatest pressure in primary provision are most likely to have the greatest pressure for places in secondary provision.

### What are the risks?

The risk is that the council is not able to secure sufficient school places for every child in the city that wants one, and so is in breach of its statutory duty. The factors that could cause this risk to materialise are:

- There is no certainty that proposals to create additional schools places will be approved. If proposed expansions to existing schools, changes to the age ranges of existing schools, or proposals to hold a competition to create a new school are not acceptable to communities or to elected members (for example because of concerns over implications for traffic, highways, green space, or the potential impact on the sustainability of nearby schools) this can result in proposals being declined by Executive Board.
- A lack of physical options for expanding existing schools or identifying potential sites for new schools in areas of need.
- A lack of capital funding to be able to implement proposals for creating additional places. Basic Need proposals have been funded through education capital programme funding, with additional support provided from central government, in acknowledgement of the particular school place pressure in Leeds. In the existing financial climate, it will become increasingly difficult for local authorities to secure increased capital for school place expansion. Any capital budget deficit will impact not only on our ability to meet the need for school places, but also on delivering other capital projects, such as the maintenance of the school estate.
- A conflict with developing national policy on changes to school governance. As increasing numbers of schools convert to become academies, or become sponsored academies, the maintained school estate is reduced, and correspondingly the council's scope for adapting this estate to population pressures is reduced. This does not prevent the local authority working with academies to commission school places, as local authorities still have overall responsibility for ensuring that there are sufficient spaces to meet demand locally, but the decision-maker over requests to expand pupil numbers at an academy is the Secretary of State, rather than Leeds City Council.



- New housing developments will add additional pressure to both the primary and secondary phases. The Leeds Development Framework (2004 – 2026) detailed a figure of 86,440 total new houses required. Where there is no existing capacity, housing developers are asked to contribute through section 106 agreements.

The consequences of the risk materialising would be:

- The council would be in breach of its statutory responsibility to secure sufficient school places.
- Children could be expected to attend a non-local school where capacity exists. It is preferable to avoid this outcome since it means more of our youngest children travelling greater distances, and it does not take full account of parental preference. Additionally, there would be cost implications of making transport available for more children to travel to school to access reception classes, and increasing the distance a child needs to travel to school risks creating possible non-attendance issues.

### How is the council managing the risks?



The Basic Need programme represents the council's response to the demographic pressures in primary school provision. Through this programme it has delivered 675 new reception places since 2009.

There are a number of controls that the council has taken to manage the risk of being unable to meet demand for school places. These can be broadly grouped under the following headings: making good use of projection data, using this to bring forward proposals for additional places in time to meet anticipated demand, and securing appropriate capital.

#### ***Use of population projection data***

Estimating population change has become more difficult because of complex patterns of international and national migration. These factors are especially important in large and diverse areas such as Leeds, which include significant student populations. Population changes below city-wide level (e.g. area, ward, and cluster) are especially difficult to analyse and predict with certainty.

However the council is confident that the current school place planning methodology compares well with best practice nationally, as supported by the findings of a scrutiny review in 2009. Pupil projections are maintained as a live system, updated twice per year: in the autumn, with the latest annual birth data, and in the spring with school census data replacing the projected numbers for the current year and updating the projections for future years based on new and current information.

#### ***Bring forward proposals for additional places in time to meet demand***

The council uses projection data for each primary planning area to identify where there is likely to be increased demand in coming years. This work takes place at the earliest possible opportunity. For example, work on proposals for increasing provision for the coming academic year (2012/13) began in autumn 2010.

The council engages with schools and their governors over potential expansion proposals and assesses the feasibility of sites for expansion and remodelling. The statutory process for school expansions involves first a public consultation, and then a statutory notice, both of which allow for representations to be made from stakeholders. Ward members in all wards city wide are formally consulted at a public consultation stage, both individually, and through area committee meetings to ensure awareness of all proposals city wide and improved understanding of the impact of proposals in adjoining areas. The use of the Family Hub website was successfully piloted for consultations that took place in autumn 2011, and awareness was promoted through various community groups.

Given the significantly increased numbers of births in the city, our ability to expand existing schools is likely to become increasingly constrained. A need for new schools is likely to arise in parts of the city. Executive Board in January 2012 approved proposals to create new schools in the Harehills planning

area and in the Beeston and Holbeck planning area. 'Invitation to bid' statutory notices have been published for these schools, and these competitions will proceed under the provisions of the Education and Inspections Act 2006, but future processes for establishing new schools will need to be carried out under the Education Act 2011 legislation, which came into effect in spring 2012.

The Act requires the authority to seek an academy provider in the first instance. Should this not be possible, a competition may then be held with the consent of the Secretary of State. The local authority cannot bid, and the authority is the provider of last resort should no other providers be found.

### ***Secure the maximum amount of capital available to fund the creation of additional places***

The council has been engaged with central Government to negotiate increased funding since the scale of the Basic Need demand first became apparent in 2009. This is dependent on national resources and the demand pressures that exist in other local authorities, which are known to be significant. That this funding is usually confirmed a year at a time is not ideal in terms of developing long term plans.

The education capital programme has been limited to the delivery of primary basic need and urgent (priority 1) maintenance works alone.

The Council's Children's Services and City Development directorates have engaged and meet on a continual basis to identify and appraise suitable available Council sites in the planning areas required.

The council undertakes to secure funding from housing developers as a contribution towards the impact this is likely to have on the demand for school places. Developers need to pay contributions towards education requirements (termed 'Section 106 contributions') if their development is for 50 or more family dwellings and if there is no spare capacity in the local area. Contributions are based on average "yields" from developments of 0.25 primary-aged child per family dwelling and 0.1 secondary-aged child per dwelling.

### **What more do we need to do?**

Each year we will continue to update population predictions and use this information to seek out opportunities for creating additional places in the areas of need.

- **Primary:** Each year we bring forward proposals to increase the supply of primary school places in line with predicted demand, to ensure that every child can be offered a reasonable school place.
- **Secondary:** We will map out the predicted demand for secondary places based on the current birth rates. We will add to this the anticipated need arising from the housing core strategy by working with colleagues in planning. This will create a model of the city for 2020 that will be used as the planning tool for bringing forward proposals for the expansion of the secondary estate. There will be further work with corporate colleagues to assess how this demand can be met.

### **Further information**



All reports that seek permission to consult about the creation of new school places, reports on the subsequent outcomes of those consultations, and design and cost reports basic need projects are publicly available as Executive Board reports.

Please use the following link to access them:

<http://democracy.leeds.gov.uk/ieListMeetings.aspx?Committeeld=102>

## Leeds Economy Corporate Risk Assurance

### Background

Leeds has transformed itself in the last 20 years. It is the second biggest local authority area in England, home to 800,000 people and has a working population of 550,000. In the last decade it created more jobs than any English city outside London and it employs more people in the knowledge economy than anywhere except the Capital. Leeds is now at the heart of a major city region and it is an international destination. It has plenty to be proud of; but look around and the potential for further progress is clear. Leeds lost over 20,000 jobs in the recession and too many communities are cut off from employment and the wealth of a growing city.

### What are the risks?

The main economic risks come from the global and national economy. The nation is currently experiencing a double dip-recession with only minimal growth expected over the next few years. Private sector job creation will be slow and this is coupled with public sector cuts that reduce the level of jobs in the sector, and the service that can be provided. This reduces the ability of the public sector to manage the risks or stimulate the local economy as a counter cyclical measure.



The localisation of business rates will have a significant impact on the authority's funding; a depressed economy, with a low business-base, will produce lower income for the authority, further impacting on its ability to stimulate the local economy.

### How is the Council managing the risks?

The council carries out a number of tasks to support the sustainable growth of the economy, the state of which is regularly assessed and reported through the Leeds Economy Handbook, Bulletin and various employment reports. This intelligence regarding the economy is widely used to inform the council's work and feeds into, for example, the annual State of the City Report. Furthermore, close working with partners, the business community and third sector, are essential factors in seeking to maximise the potential benefits from a collaborative and mutually supportive approach. During the past year the Sustainable Economy and Culture Partnership has established itself as a key forum to focus effort and help drive the economy's recovery. It has already started to reduce the frustration of those who are eager to make improvements and promote the city in line with the shared aspiration to make Leeds the Best City in the UK by agreeing priorities and a desire to focus on a small range of transformational projects.

For example, the 2010 Spending Challenge consultation revealed that 90% of citizen's panel respondents felt the Council should work to get local jobs, for local people, and 89% felt new developments should be allowed provided new jobs are created. This is reflected in the Council's Vision aims, and the priorities of the Sustainable Economy and Culture Board (SECB). The Board has now identified a pipeline of projects which will deliver these priorities, and from these it has highlighted a small number of transformational projects which will deliver growth.

Among these are Trinity Leeds (the largest shopping development on site in Europe) and the Arena developments, both of which are on-track to complete in spring 2013, with the creation of an anticipated 5,000 jobs. Significantly, the opening of Trinity will move Leeds from 7<sup>th</sup> to 4<sup>th</sup> in the retail rankings. The SECB is keen to ensure that the City benefits fully from all the transformational projects; for example a Leeds Arena Quarter master-plan is in place, with associated developments progressing and a new hotel now open as a result of the development. Work is also progressing to enhance the city's retail offer with the Eastgate and Kirkgate Market projects.

Another transformational project, the Aire Valley Enterprise Zone (EZ), was established on April 1<sup>st</sup> 2012 providing businesses with relaxed planning conditions, business rates relief and super-fast broadband to encourage business growth and investment in the area. Funding to bring part of the EZ into production has been agreed by the council, to help facilitate development; however some

schemes within the AV have not progressed as quickly as anticipated due to the prevailing difficult economic conditions.

Working with partners and developers is clearly key to supporting economic growth, and the South Leeds Investment Partnership (SLIP) is a good example of this. It is an initiative involving significant commercial property owners in the South Leeds area, working with the council to attract investment and support regeneration. This runs alongside work to deliver a City Centre Park to the South of the city.

The SECB has also endorsed the new Economic Growth Strategy, which focuses on key sectors (Health and Medical, Financial and Business Services, Low Carbon Manufacturing, Digital and Creative, Retail, Housing and Construction, Social Enterprise and the Third Sector) for Leeds in terms of both existing jobs and new job opportunities. Lead partners have been identified on the Board to co-ordinate work on Health and Low Carbon; it is recognised that progress will depend on a sharpening of focus on a small number of key priorities.

The next meeting of the SECB will focus on Jobs and Skills in a similar way. It is intended that the work of the Board can complement the work currently carried out by the employment and skills team in terms of linking local people to jobs that are created in the area.

The importance of good communications to businesses is recognised, and Leeds and Bradford successfully became two of the first super connected cities in the UK receiving Government funding of up to £15 million to support the roll-out of ultra-fast broadband (100mb+) to 88,000 homes and over 16,000 businesses, and to develop full wireless coverage within both city centres and along key transport corridors between both cities.

Similarly, an integrated transport system has been identified as a priority for the economic development of the city by the SECB, and partners, echoing the emphasis put on transport requirements during the Vision consultation. Major transport infrastructure projects include the Leeds Station South Entrance, construction of which is anticipated to commence in summer 2013, with opening scheduled in late 2014, and the rail growth package. Funding continues to be sought for the New Generation Transport scheme and the Flood Alleviation Scheme.

Considerable success has been achieved in terms of apprenticeships; there were 2,278 Apprenticeship starts in the current academic year, compared with 1,730 in the same period the previous year, a yearly increase of 32%, with a range of employers involved and a variety of subjects offered including Customer Service, IT & Telecoms, Beauty Therapy, Retail, Hospitality & Catering and Health & Social Care. Over 760 apprentices have participated in the Council's own apprentice programme; the scheme is now one of the largest in the country. The council's support arm to employers in the city, Employment Leeds, has identified 227 new apprenticeship opportunities. We are seeking support from the government through the City Deal initiative to support an accelerated programme of support to SMEs to take on apprentices in Leeds and across the Leeds City Region.

### **What more do we need to do?**

One of the key issues identified by the SECB is the lack of a clear marketing strategy. A new Chief Executive is now in place at Marketing Leeds, and she has identified that one of her first priorities will be to develop a marketing plan for the city.

We shall continue to work with partners to identify and maximise the wider benefits which are offered by the major transformational projects which are either already in progress or which will come on stream in the course of the next few years.

Due to the wide and diverse nature of the work of the SEC Partnership, a Performance Steering Group has been established to review detail performance against the stated priorities and then report key issues, risks or opportunities that it feels need to be brought to the Board's attention; this process needs to become fully embedded into the Boards forward work programme.

An updated economic assessment will be carried out shortly and this will feed into an updated growth strategy.

### **Further information**

Further information is available at [www.leeds.gov.uk/economy](http://www.leeds.gov.uk/economy) and [www.leeds.gov.uk/ep](http://www.leeds.gov.uk/ep)

## Council Tax Support Corporate Risk Assurance

### Background

Council Tax Benefit will be replaced by a localised scheme of Council Tax Support (CTS) from April 2013. The Government has set out some key elements to councils which must be included in a scheme. These are:

- Local authorities to have a duty to run a scheme to provide support for council tax in their area.
- There will continue to be a national scheme for pensioners which will continue to provide the same levels of support as the current Council Tax Benefit scheme.
- Government funding for the scheme will be through a fixed grant which will be reduced by 10% in comparison to spend on Council Tax Benefit. Councils will be required to fund both the national pensioner scheme and the local working age scheme from the fixed funding. Councils will be able to put their own funding into local schemes.

Councils will be able to design their own local schemes. In doing so councils will need to consider whether the local scheme should be designed to keep costs within Government's funding allocation.

- If costs are to stay within Government funding allocation, working age customers will face a reduction in Council Tax support. At current levels of Council Tax benefit spend it is estimated that working age customers in Leeds would face a reduction of 18% in their Council Tax Support. Increases in Council Tax or increases in caseload would lead to large reductions in support; decreases in Council Tax or in caseload would lead to smaller reductions in support.
- Councils will need to decide whether some working age customers should be protected from reductions. Typically, this might include customers with disabilities, lone parents with children under 5 and customers in receipt of war widows or widowers pensions. Protecting some groups from reductions will lead to larger reductions for non-protected groups if scheme costs are to be kept within Government funding levels.
- Councils will also need to have regard to the impact on work incentives and, in particular, avoiding schemes that create a disincentive to move in to work.

Councils are required to adopt schemes by 31<sup>st</sup> January 2013. Councils who fail to adopt to a scheme by this date will fall into the default scheme. The default scheme will reflect the current Council Tax Benefit scheme and would see councils having to fund the difference between the full cost of the scheme and the Government's grant allocation.

### What are the risks?

The proposals carry risks for the Council in relation to the adoption of a scheme in time for April 2013 and the ongoing delivery of it thereafter. This risk also covers the impact on collection rates and financial pressures that may arise from unexpected or unplanned demand. The key risks identified are:

- A high level of change is required in a short timescale (January 2013) with the consequent risk that a scheme will not be adopted in time.
- An adverse impact on collection rates/ council tax yield as a result of non-payment.
- Inability to bill Council Tax.
- Financial pressures on the council budget and/or reserves (arising from unexpected or unexplained demand).
- Reputational damage for the Council if the risks above materialise.

Once the Council Tax changes have been implemented, the focus of this risk will move towards the ongoing management of the scheme.

### How is the Council managing the risks?

Local CTS is considered as part of the Council's Welfare Reform Strategy Board remit for overseeing preparations for the welfare changes. A timetable for scheme adoption and scheme implementation is in place which, at the time of writing, will see a report to Executive Board in June 2012 seeking approval to carry out a public consultation exercise on scheme options with a view to enabling a scheme to be adopted in November/December. Work has been carried out on scheme modelling options and these options will be shared with Cabinet on 17<sup>th</sup> May 2012.

A Project Board and Project Manager will be put in place to oversee the implementation of a local scheme. The Project Manager will also be expected to work closely with the West Yorkshire Group that has been set up to share best practice around developing and delivering local schemes. Leeds, along with the other West Yorkshire authorities, has already started officer-led consultation with the major precepting authorities.

Officers from Leeds are involved with the Department for Communities and Local Government (DCLG) in looking at the design arrangements and the support required by local authorities to deliver schemes. This has included the development of a modelling tool that has now been made available to local authorities

Discussions have taken place with systems' suppliers to explore the feasibility of system changes that can be delivered for localised Council Tax Support.

### What more do we need to do?

Further work is required on potential funding options for the various scheme models including additional work on technical reforms to Council Tax which are expected to give powers to councils to vary discounts and exemptions relating to empty properties.



DCLG intends to consult on funding allocation options in May 2012 with the final allocations following on from the Office for Budget Responsibility's assessment of what the likely spend on Council Tax Benefit would have been in 2013/14 – this assessment is due in November 2012. Work is also underway in looking at new burdens and implementation costs arising from localised support for Council Tax. It is important that DCLG recognises the need for councils to implement transitional schemes for year 1 and supports this approach by making new burdens funding available in both year 1 and year 2

### Further information

The Government consulted on the proposal to replace Council Tax Benefit in England with 'localised schemes of support' from April 2013. Please use the links below to view this consultation document, Leeds' response and the Government's response in turn to this consultation.

- Click [here](#) for the Government's consultation paper.
- Click [here](#) for Leeds' reply.
- Click [here](#) for the Government's response to the consultation.
- Click [here](#) for the Department for Communities and Local Government Council Tax Support scheme web site

## City Flooding Corporate Risk Assurance

### Background

In 2010 the Environment Agency (EA) approved a comprehensive Flood Alleviation Scheme (FAS) for Leeds which provided a defence against a 1 in 200 year flood costing £188m. However, in January 2011, the Council and the EA were informed by Defra that the comprehensive scheme would be subject to the new “payments for outcomes” funding assessment model. This prioritises residential flood protection schemes ahead of schemes that protect businesses and distributes the “flood defence grant in aid” accordingly.

For Leeds, because of the predominance of businesses on the Waterfront, this means the potential central government grant is relatively low requiring the shortfall to be made up from significant external funding, estimated at £120m compared to the original £30m anticipated. This made the Comprehensive Scheme unaffordable in the foreseeable future.

In recognition of the lack of funding an alternative phased approach has been developed. The latest proposal is for a Flood Alleviation Scheme just for the City Centre, which would look to provide a 1 in 75 year protection from river flooding. The cost of this scheme is around £75m with national funding potentially around £7 - £10m. The Council has promised £10m and the shortfall would need to be provided through external funding.

### What are the risks?

In 2000, the city centre was only centimetres away from flooding with further near misses in 2004, June 2007 and January 2008. It has been estimated by the EA that over 4,500 residential and commercial properties are at risk and approximately £400m of direct damage would be caused by a major flood from the River Aire in Leeds.

#### Sources of the risk:

- Climate change
- Significant heavy rain
- Planning decisions
- Lack of funding for identified maintenance and capital schemes



#### Potential consequences:

##### *Community*

- Leeds as a whole and individual communities and areas are insufficiently prepared for major and minor flooding incidents.
- Impact on residents: loss of life or injury due to deep flooding or out-of-channel flood flows; personal distress, temporary homelessness, loss of belongings.

##### *Financial*

- Damage to and contamination of domestic and business properties on large-scale, including Council buildings, with possibility of long-term property blight and consequent damage to the City Region’s major business economy.
- Damage to vital infrastructure including; roads, power, communications and water
- Loss of confidence in the City’s ability to cope resulting in a decline in inward investment.
- Inability to fund capital improvement works promptly results in an increased cost over time.

##### *Reputation*

- Adverse publicity and loss of confidence in the City’s ability to deal with flooding.

## How is the Council managing the risks?

The Director of City Development submitted a report to Executive Board in February 2012 providing an update on the progress of proposals to provide flood defences for the city. In response to this, Executive Board acknowledged that the original comprehensive flood defence scheme would not be funded and in light of that gave approval for a phased approach with the aim being to complete 'Phase 1' to achieve a 1 in 75 year Standard of Protection for the City Centre area from Leeds Station to Knostrop Weir by the end of 2015, providing it is 'affordable and practicable', and approved expenditure of £500k on further work to support a bid for further funding from the Communities and Local Government to the value of £30m. LCC and the EA continue to canvass interested parties for external contributions.

A draft business case for £10m funding has been submitted to the European Regional Development Fund (ERDF).

A Project Manager for the scheme has been appointed and work continues to ensure we meet the September deadline for submission of the funding bid.

## What more do we need to do?

Leeds City Council is limited in terms of what it can do until funding has been sourced. However, Leeds' MPs have committed to continue liaising proactively with Defra and the Environment Agency in order to support the Council in its ambition to progress a flood defence project for the city by providing minimum match funding, seconding technical staff and sharing all relevant technical information.

## Further information

Flood Alleviation Scheme Project Manager – Andrew Wheeler (0113 3951681)

Environment Agency Website:

<http://www.environment-agency.gov.uk/homeandleisure/floods/106693.aspx>

Executive Board Report & Minutes:

<http://democracy.leeds.gov.uk/ieListDocuments.aspx?CIId=102&MIId=5235&Ver=4>

## City Resilience Corporate Risk Assurance

### Background

The purpose of this report is to provide assurances linked with managing the risk of significant disruption to Leeds as a city. Work is undertaken at a West Yorkshire and Leeds level to identify, assess, prevent, prepare, respond and recover from emergencies and disruptions captured under this corporate risk. A multitude of risks and threats are identified on the West Yorkshire Community Risk Register (WYCRR), all of which could impact upon the city. A range of response capabilities, such as evacuation or shelter, are identified to manage these risks.

This corporate risk does not focus on the physical risks that may manifest, in the form of floods or industrial accidents, but more on the risk that our arrangements to manage and respond to these as a city prove inadequate.

Risk control work locally mirrors the National Security Strategy: seeking to ensure a secure and resilient Leeds, protecting our people, economy, infrastructure, territory and way of life from all major risks that can affect us directly.

### What are the risks?

The risk of significant disruption in Leeds is a combination of two primary elements; the causative event and the way in which Leeds as a city respond to this event. The Council has both a statutory duty and a community leadership role to ensure that the city collectively does all it can to enhance our resilience and manage our vulnerabilities. The public has an expectation that we do all we can as a part of our civic duties

A city wide response to significant disruption may prove inadequate due to:

- Lack of resources / contribution from partners and LCC to resilience activity
- Preparedness and mitigation measures prove ineffective
- Poor training and understanding of emergency roles by partner agencies and Council
- Conflicting, delayed or ineffective response mechanisms
- Failure to monitor hazards or threats and manage the risks through treatment and control across the long, medium and short term.
- Failure to manage or account for vulnerabilities in the population or city infrastructure
- Poor strategic leadership, command, control and communication

The risks to the city mapped within the WYCRR detail the various categories of risk such as industrial accidents or severe weather. In total there are 79 distinct risks and four threat (terrorist) categories captured on this register. Risks are assessed on their likelihood over a five year period and focus upon their impact upon Health, Social, Economic and Environment categories.

The highest rated risks for 2012 include:

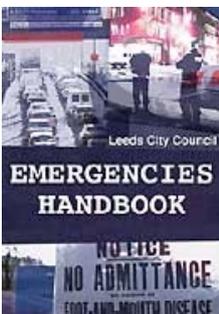
- Pandemic Influenza
- Low temperatures & heavy snow
- Flooding – All types
- Storms & Gales
- Heatwave
- Industrial Action
- Industrial Accident with toxic release
- Water / water pollution incident
- Telecoms failure
- Electricity failure
- Disruption to Oil/Gas

Matching the above risks are threats including attacks on crowded places, attacks on critical infrastructure, attacks on transport and cyber attack. At present risks do not take account of existing controls for the purpose of assessing the impact. This means that although we have a set of 'top risks' rated as high or very high, our controls to manage down the impact may in fact be good. This ensures that we consider properly the reasonable worst case scenario. Likelihood is determined by both local physical conditions and consideration of the highest possible local likelihood to be found nationally.

A risk in the city may not always come from one of those rated as highest. There are many high impact low likelihood risks such as reservoir failure. We have also seen that even minor disruption can be inconvenient and frustrating to the city. Traffic and travel disruption, short term power and telecommunications loss coupled with perceived inaction by relevant agencies can all contribute towards a community's outrage or anxiety.

Horizon scanning ensures that work on areas such as Olympic resilience, fuel crisis, industrial action, protest and disorder are built upon sound foundations and draw upon our city wide plans and capabilities.

## How is the Council managing the risks?



As highlighted, disruption is an impact caused by both the nature of the hazard/threat and the way in which we respond or interact with it as a city. The assurance will therefore focus on what we are doing with partners to manage all risks collectively and shaping the wider city response.

Under the legislative duties of the Civil Contingencies Act we have identified, and assessed all risks fully using technical 'leads' from the relevant profession and monitor these quarterly for any change.

Identified and assessed risks are channelled into work programmes undertaken by Leeds City Council and partner agencies. This occurs locally through the Leeds Resilience Group, Chaired by Leeds City Council, and also on a West Yorkshire, Regional or National basis depending on the most effective means of managing the risk.

Ways of preventing the risk from occurring are considered and if feasible, implemented, which requires influence in negotiating on a range of subject matters through Council Services such as Flood Risk Management on flood defence schemes, or in designing out vulnerabilities in new building design.

In all instances where the risk cannot be mitigated through prevention the focus shifts to preparation which includes the development of plans, training and response arrangements aimed at professional partners, businesses and the public in general. This helps reduce the impact of risks that we cannot simply avoid or remove altogether.

A focus on top risks on the register and the development of response capabilities that benefit many risks is the strategy adopted across partner organisations. An additional work area looks at vulnerability and enhancing the resilience of the city to disruption. This includes business continuity and education work with businesses, those who live in at risk areas or school children and societies most vulnerable.

The impacts of risks are captured in the risk assessments undertaken locally by statutory Category 1 & 2 responders. There are a range of tools that help us ensure that the correct plans are developed and in place across the city and these are monitored through self-assessment and peer review in addition to learning from actual incidents.

Partnerships with a role to play include:

- West Yorkshire Resilience Forum, sub-groups and associated work programmes / reports
- Leeds Counter Terrorist Strategy (CONTEST) Group
- Leeds Resilience Group work programme implementation
- Leeds City Council groups and associated work programmes / objectives

The Council plays a lead role in city resilience. In order to fulfil this role the Council has a strong commitment to building resilience in the following ways:

- A corporately agreed Emergencies Policy and Business Continuity Management Policy and accountability structure
- Developing response based equipment and utilisation of Council assets
- Strong governance arrangements across all identified capabilities and for a range of specific thematic areas referred to above
- Annual work programmes at a sub-regional, local and internal level
- A range of joint emergency plans maintained and validated
- Mechanisms in place to meet statutory duties
- Training and education for city responders and related stakeholders

### **What more do we need to do?**

The changes implemented across a range of public sector organisations over the previous three years have necessitated adaptation in the way we respond to emergencies. Within Leeds City Council one resilience priority has been on properly managing and adapting within a changing sector. Ensuring we maintain the knowledge, experience or skills in managing disruptive events is critical. An assessment of current resilience for 2012 is currently underway building on similar reviews in previous years, linked directly to risk. This will aid in the identification or continued delivery against desired outcomes. Further account is required in managing and understanding the structural changes within the health economy and how this could impact upon the city.

In recent years we have seen a great deal of work on functional capabilities such as evacuation, welfare and response to our most common risks such as flooding and severe weather. A focus for 2012-13 is on the resilience of the following essential services:

- Health
- Food & Water
- Transport
- Financial Services
- Energy
- Telecoms & Postal

At present the majority of risks on the register have a secondary impact upon these essential services either through general disruption or catastrophic failure. Tertiary impacts also occur through interdependencies between these essential services, such as loss of electricity causing water pumping stations to fail. Many response capabilities also depend upon these essential services being available. Understanding how we can mitigate the impact of such services being affected is complex, with duties sitting across a range of providers. The ability of Leeds based organisations to influence the enhancement of resilience in these organisations may be limited to corporate resilience activities and managing the readily identifiable impacts. A series of thematic workshops are being developed by Leeds City Council to address each of these essential or 'lifeline' services with partners from across the sector participating.

### **Further information**

The West Yorkshire Community Risk Register can be viewed at: [www.westyorksprepared.gov.uk](http://www.westyorksprepared.gov.uk)

The National Security Strategy can be viewed at: <http://www.cabinetoffice.gov.uk/resource-library/national-security-strategy-strong-britain-age-uncertainty>

A selection of advice and information provided to the public is also available on [www.leeds.gov.uk/prepared](http://www.leeds.gov.uk/prepared)

## Council Resilience Corporate Risk Assurance

### Background

This report provides assurances about managing the risk of disruption to Council services. A total of 119 services have been identified as being most critical because they impact on the most vulnerable people in our city or services where disruption would have an impact on human welfare, the environment, security *and* may have financial, legal and reputational implications. Such services include; Residential Services (Adults & Children), CCTV/Leeds Watch, Approved Mental Health Professional Service, Emergency Duty Team, Urban Traffic Control, Bereavement Services, Contact Centre, Meals at Home and Passenger Transport.

The purpose of Business Continuity Management (BCM) is to improve the Council's resilience against disruption of its critical services. *Effective* BCM supports critical services in being able to maintain an agreed level of service and/or recover services within an agreed timescale in the event of disruption or emergency incident.

### What are the risks?

Local, national and international events in recent times have all emphasised the importance for Councils to be prepared for a wide range of risks that have the potential to be realised at any time and without warning.

Risks can generally be categorised to those affecting premises, processes and people:

Premises	Processes	People
Fire	Loss of ICT	Pandemic Illness
Flood	Sabotage	Loss of Key Staff
Utility Failure	Cyber Attack	Loss of Transport
Adjacent Incident	Loss of Key Equipment	Industrial Action
Terrorism/Hoax/Arson	Loss of Suppliers	
Industrial Accident		

### How is the Council managing the risks?

The Council has a Business Continuity (BC) policy, the purpose of which is to set out the Council's commitment and approach to BCM in order to ensure that it can continue to provide services in the event of an emergency or disruption that may result in a loss of staff, premises, ICT, equipment or failures by partners and contractors.

A full and fresh review of all services has ensured that there is an accurate list of critical services within the organisation. The launch of the toolkit will assist these services in meeting the Council's legislative responsibilities.

The Council's most critical services cover a diverse range of services, all with an equally diverse range of risks. Council Resilience has 3 distinct areas of risk. The first relates to BCM and the risk that our arrangements to improve Council resilience prove inadequate. The second and third areas relate to Industrial Action and ICT, the former because of its recent and ongoing potential to disrupt services and the latter due to the sheer dependency of Council services on the ICT infrastructure.

For each of these areas there are a number of current and emerging risks identified, along with current controls and any future actions to be taken.

### 1. Business Continuity Management

- **External contracts:** An increase in outsourcing and commissioning services may reduce operational cost and transfer financial risk, however operational and reputational risk will remain. Current controls include reference to supplier BC and Disaster Recovery Plans in

both the Conditions of Contract and Contract Procedure Rules. Future controls are to identify and assess BCM arrangements for those critical services that have been outsourced/commissioned and to introduce greater rigour relating to BCM in Pre Qualification Questionnaires and Tender Documentation.

- **Reliance on core services such as ICT, HR and Facilities Management:** The BCM programme is developing a series of Core Responder Planning Assumptions. These will contain the minimum service or response that the core responder services will provide during a disruption and will inform the development of critical service BC plans.
- **BCM and response:** The Health Check Review will assess existing BC plans against the good practice guidance contained within BS 25 999 identifying gaps and making recommendations. BCM response will be further improved through testing and exercising of BC plans and raising of awareness amongst staff responsible for critical services.
- **Information sharing:** The BCM Toolkit will help managers to identify where there are interdependencies with other services (either provided by the Council or commissioned from other providers), and suppliers leading to greater collaboration and information sharing.
- **Directorate resources / contribution:** Service managers are responsible for the BCM plans of their service. This requires direct engagement with managers responsible for the critical services to nurture adequate levels of contribution. Greater contribution and engagement with managers will continue to be sought by providing tangible support in developing continuity arrangements.
- **Training and Exercising:** Teamwork, competence, confidence and knowledge will be developed through exercising and testing. Guidance and support will be provided to all critical services to ensure plans are regularly tested and exercised and to help develop staff awareness of their role during a disruption.
- **Monitor hazards or threats and manage the risks:** The Business Impact Analysis includes a risk assessment identifying the threats which have the potential to disrupt critical services. This information is then used to inform the development of BC plans.
- **Disruption to fuel supply:** The lists of critical services have been used to support the process for identifying services dependent on transport. This will inform the issue of permits under the Government Priority Use Scheme. Preparations have also required reporting to Central Government of fuel contingency arrangements.
- **Links with external contracts or partnership arrangements with other sectors, including health:** Links are maintained with other sectors such as the Police, Fire & Rescue, NHS, and Environment Agency etc. through attendance at Local Resilience Forum meetings.

## 2. HR Industrial Action

The BCM Programme provided key input into planning for the 2011 industrial action. The up to date lists of critical services informed the requests made to Trade Unions for exemptions. Wider liaison with partner agencies was also evident. Work has commenced in collaboration with HR to develop an Industrial Action Procedure to enable a more structured approach to the preparation and management any future instances of Industrial Action.

## 3. ICT Services

The Council's dependence on the ICT infrastructure and the potential impact of its failure on LCC's most critical services, for example, those services which depend on ICT systems to support the care of vulnerable adults and children require effective and robust business continuity and disaster recovery arrangements. The BCM Programme is working on a more collaborative approach between

the critical services and ICT Services in the development of realistic BC plans and ICT Disaster Recovery Plans.

A focus on promoting business continuity *without* dependence on ICT is essential. The BCM Programme will emphasise the need for critical services dependent on ICT to develop manual workarounds or other solutions to maintain service delivery during a short to medium term ICT outage.

### **What more do we need to do?**

Although some services currently have BC plans in place, developing, implementing and testing BC plans for the 119 *most* critical services may take 12 months to achieve and depending on the degree of engagement from the managers within each directorate, could take longer leaving critical services exposed to risk. To have BC plans in place and tested for all 119 most critical services would provide LCC with a good level of Council Resilience. Top level support for the BCM Programme is therefore absolutely essential in making the desired progress.

The increase in commissioned services is an area where continuity arrangements need to be urgently considered and implemented for services already commissioned and the future procurement of new services.



### **Further information**

Want to know more about our work? Visit [www.leeds.gov.uk/prepared](http://www.leeds.gov.uk/prepared)

## Financial Management Corporate Risk Assurance

### Background

Balancing the books and ensuring that we live within the available funding whilst at the same time ensuring that resources are directed at our key priorities has always been a challenge within Local Government. Today local government is facing its greatest financial challenge for more than a generation. Leeds is not exempt from this new environment having had to deliver more than £90m of savings in 2011/12, set a budget to bridge a budget gap of £55m in 2012/13 and facing having to make further significant savings for the next four years.



Sound financial planning and management are crucial to any organisation although the current financial challenges facing the Council undoubtedly make it even more critical that these arrangements are fit for purpose.

### What are the risks?

Although councils have a legal duty to set a balanced budget (taking account of any use of reserves, they cannot budget for a deficit position), there are clearly strong organisational reasons for ensuring that the we have in place sound arrangements for financial planning and management. The budget as well as a means of controlling spending to the available resources is also a financial expression of the Council's policies and priorities. Whilst this can simply be seen as an annual exercise, there is a recognition that this needs to be set within a context of a medium term financial strategy. This is all the more critical given the financial challenges that we are facing. In line with the Spending Review 2010, Local Government is facing a real terms reduction in Government funding of around 28% over a 4 year period, with the likelihood of further reductions beyond. The challenge for the Council is to reshape its services over a 3/5 year period within a significantly reduced funding envelope, and at the same time to deliver positive outcomes across a range of services.

Developing a sustainable and deliverable medium term financial plan which informs the setting of the annual budget is crucial to our best Council ambition. Failure to adequately plan, both long term and annually and to manage the budget in year carries a number of specific risks:

- Not able to set a legal budget by the due date
- Budget does not reflect Council priorities
- Budget does not adequately resource pressures and increases in demand
- Budget includes savings which are not deliverable
- Unplanned or panic measures in year to deliver savings
- Council falls into negative reserves or reserves eaten into impacting upon future years' budgets
- Section 151 officer (Director of Resources) exercises statutory powers and restricts or stops all spending.
- Need for an excessive increase in the Council Tax with the potential for capping/referendum.
- LCC's reputation damaged
- Audit certificate contains damaging comments and Increased audit and government inspections
- Staff morale suffers if seen to be working in a bad budget climate.

### How is the Council managing the risks?

Managing the Council's budget is not just a role for finance staff, but nevertheless, the duties of the Council's Section 151 officer are crucial in how we are managing these risks. These duties include:

- to report to Council on the robustness of the estimates and the adequacy of financial reserves

- certifying that the accounts are a true and fair view of the Council's financial position
- ensuring that the Council's financial systems accurately record the financial transactions; enable the prevention and detection of inaccuracies and fraud and ensure risk is appropriately managed.

The role and responsibilities of the statutory finance officer manifest themselves operationally through the financial cycle which covers:

- Budget preparation and setting.
- In year budget monitoring.
- Closure of accounts and reporting.

However, it does need to be appreciated that financial management within the Council, both corporately and within directorates is delivered by colleagues who are managerially responsible to the Director of Resources. Many of the senior colleagues within the financial management services are professionally qualified with many years of experience, and are themselves personally and professionally responsible for their actions and advice. This is reinforced through an appraisal scheme which incorporates the identification of key skills for finance staff, programmes of continuing professional development and peer review forums to ensure integrity as to the accounts and budget monitoring processes. Moreover, our service planning helps to ensure that there is a continual review of our processes and the ways in which we can improve our services and the financial management of the Council.

**Budget Preparation and Setting** - The process of compiling the revenue budget starts soon after the budget setting of the previous year and runs through to the approval of the budget by the Council and includes:

- an early assessment of available funding and key pressures which is subject to a number of iterations with assumptions being reviewed regularly.
- preparation and input of detailed estimates into the budget module of the Council's Financial Management System (FMS) in late summer, involving budget holders reviewing their spending requirements in conjunction with directorate based finance staff and in accordance with the corporately determined guidelines and timescales.
- the development of options to balance to available resources through close engagement of senior officers and Executive Board portfolio Members at appropriate points in the process.
- review of budget proposals by finance staff, CLT and Executive Board members
- consultation with the public and other stakeholders
- agreement of initial budget proposals by Executive Board and submission to scrutiny.
- with limited resources, it is inevitable that elements of the budget will depend upon actions which have yet to happen, or upon assumptions that in reality may vary from those assumed at budget setting. As such an important element of the budget process is the development and maintenance of a budget risk register which attempts to identify and assess the risks built into the budget estimates. The budget risk register not only assists in assessing the robustness of the estimates but also acts as a means of assessing the adequacy of reserves in that it provides an assessment of what may go wrong in year.

In terms of the Capital budget a five year programme is prepared. The programme is constrained by the same funding reductions as the revenue programme as ultimately where schemes are funded from borrowing this needs to be repaid from revenue. The level and type of borrowing is determined before the start of the year and a limit set in accordance with CIPFA's Prudential Code. Any in-year revisions need to be approved by Council. Within this framework it is imperative that only priority schemes are progressed and the programme is categorised into five investment objectives which are:

1. Improving our assets
2. Investing in major infrastructure
3. Supporting service provision
4. Investing in new technology
5. Supporting the Leeds economy

**In Year Budget Monitoring** – Revenue budget monitoring is a continuous process which operates at a variety of levels throughout the Council. Although directors are ultimately responsible for the delivery of their directorate budget, operationally these responsibilities are devolved down to around 600 budget holders within the Council. Every budget has a named budget holder who is responsible for managing and monitoring income and expenditure against the approved budget.

Financial Monitoring within the Council is facilitated by the Council's Financial Management Systems. On a monthly basis budget holders review their spend to date against the approved estimates and against profiled estimates and project their year-end position. There are also instances where spending is controlled on systems other than the Council's FMS, for example community care payments. In these instances, procedures are in place to ensure that information held in these systems are regularly reconciled to FMS. Ensuring the integrity of the accounts is as important to our budget monitoring processes as it is to the accounts, and this is a key role of the Integrity Forum which includes senior finance staff and is chaired by the Chief Officer – Financial Management.

Financial monitoring is undertaken and operates on a hierarchical basis, whereby the monthly projections of budget holders are aggregated upwards to be reviewed by Chief Officers and Directors. The projections for each directorate are submitted to the Director of Resources and are reviewed and challenged by the Finance Performance Group. The projections are then reported monthly to the Corporate Leadership Team, the Executive Board and Scrutiny Board. As well as being accurate, monitoring also needs to be timely, and as such monthly reporting is operated according to a strict timetable.

In line with the Council's value of Spending Money Wisely, it is critical that where projected overspends are identified that action is taken to bring spending back into line with the approved estimates or to identify other sources of funding such as areas of under spend. In year, any decision to amend budgets is undertaken within the virement rules agreed annually by full Council as part of the budget setting process.

In terms of the Capital programme this is closely monitored and quarterly updates presented to Executive Board. In order to ensure that schemes meet council priorities and are value for money the following processes are in place:

- new schemes will only take place following approval to a full business case and required resources have been identified
- promotion of best practice in capital planning and estimates to ensure that they are realistic
- the use of unsupported borrowing is based on individual business cases and the source of revenue resources to meet the borrowing costs is clearly set out.

The revenue budget risk register is reviewed on a quarterly basis, and any very high or new risks are reported as part of the report to the Executive Board.

One of the main risks in developing and managing the capital programme is insufficient resources are available to fund the programme. A number of measures are in place to ensure that this risk can be managed effectively:

- monthly updates of capital receipt forecasts prepared, using a risk based approach, by the Director of City Development;
- monthly monitoring of overall capital expenditure and resources forecasts alongside actual contractual commitments;
- quarterly monitoring of the council's VAT partial exemption position to ensure that full eligibility to VAT reclaimed can be maintained;
- ensuring written confirmation of external funding is received prior to contractual commitments being entered into;
- provision of a contingency within the capital programme to deal with unforeseen circumstances;
- compliance with both financial procedure rules and contract procedure rules to ensure the Council's position is protected

**Closure of Accounts** - Getting our accounts produced on time and without audit qualification is important to ensure that we can properly account for the resources we have used during the year and

that we understand the Council's financial standing. The Chief Officer Financial Management oversees the closedown process and the Director of Resources reviews both the accounts themselves and the processes used to compile them, before certifying signing them as a true and fair view. Alongside the budget monitoring process, significant accounting decisions are referred to the external auditors (KPMG) for review by their technical accounting team to ensure compliance with applicable accounting standards. KPMG are also consulted on such decisions to ensure they are agreed by all parties before a major financial decision is made.

**Audit and Inspection** - The Council's external auditors provide members with independent assurance that, in their opinion, the accounts do reflect a true and fair view of the Council's financial position and that they comply with proper accounting practice and that the Council has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources. Internal audit also undertake a number of reviews of our financial planning and monitoring arrangements.

### **What more do we need to do?**

It is recognised that we do need to develop our approach to medium term financial planning beyond just identifying likely budget gaps to encompass a greater recognition of priorities and areas for disinvestment. This work is underway in conjunction with CLT.

A number of tools have also been used internally to test the strength of our financial planning and management arrangements. These tend to identify areas of good practice in order to drive improvement rather than providing an overall score. One such tool is CIPFA's Financial Management Model, which is on its third iteration. Grant Thornton in their November 2011 publication "Surviving the storm: how resilient are local authorities" reported on their national programme of financial health reviews, and identified best practice. Both these tools will be used in the coming months internally to assess our current arrangements and identify any areas of improvement.

### **Further information**

Doug Meeson – Chief Officer Financial Management

Report to Corporate Governance and Audit 28 March 2012 - Financial Planning and Management Arrangements [link](#) .

## Health & Safety Corporate Risk Assurance

### Background

This is the first risk assurance report which covers assurances relating to the risk of a health and safety failure resulting in death, injury and legal challenge.

### What are the risks?

That a serious incident occurs causing death(s) or injury(ies) to employees or clients arising out of the many council functions. Examples could include School trips, Social Services activities or construction projects.

Lengthy investigations by the Police and other enforcing authorities such as the Health & Safety Executive (HSE) or West Yorkshire Fire and Rescue Service (WYF&RS) may require suspension of functions and/or buildings during this period.

Repercussions where Leeds City Council is deemed at fault may be unlimited fines, adverse publicity, public enquiry or possible negligence manslaughter charges against individual officer or elected members involving custodial sentences or corporate manslaughter charges brought against a Council leadership board.

Asbestos management still requires improvement within Schools and buildings leased and buildings let out by the Authority.

### How is the Council managing the risks?

A 4 year H&S Vision has been agreed to improve the way H&S is managed within the council. 8 key priorities have been set with each priority having a number of objectives and targets. An H&S strategy group consisting of key personnel across the council is overseeing progress against this vision.

A fire safety concordat was signed with WYF&RS in March 2011 with a 3 year plan on how LCC will improve fire safety across all services. The 1<sup>st</sup> year review is currently taking place and considerable improvements have been made so far. Regular meetings take place with WYF&RS to ensure we are meeting our objectives. Since this agreement was reached no Enforcement Notices have been received by LCC in the last 12 months. The concordat has also incorporated schools and the housing Arms Length Management Organisations (ALMOs).

A recent Internal Audit was conducted during Q4 2011/12 looking at Corporate H&S Central Controls. Improvements have been made since the previous audit conducted in 2008 with good assurances for the control environment and acceptable compliance.

Working groups for asbestos and construction/contractor management have been set up to improve these areas across all LCC. Action plans have been drawn up and a separate report on asbestos is scheduled for submission to CLT in May 2012.



Better relations between the Authority and the HSE and WYF&RS have been developed. This has assisted the authority in not having any formal enforcement action taken on us over the last 12 months. The HSE have been involved in various investigations but have been assured that we have been able to deal with these particular issues internally without the need for formal action. The previous year we received 5 formal notices from the HSE including a prosecution. The WYF&RS had issued the Authority with 8 enforcement notices during 2010/11. Formal notices are held on public records and can also affect some services like Commercial Services when competing for contracts as these need to be declared at the contract tender stages.

## What more do we need to do?

Further work is ongoing to ensure Schools are complying with their responsibilities for statutory inspections. This includes gas, electricity, lifting equipment, legionella, fire safety and asbestos. The report referred to above will need to be considered by CLT as to whether more central controls are required for the State funded and voluntary controlled Schools is required.

Better incident investigation is required by service managers to properly identify root causes and underlying causes of why the incidents have occurred to ensure preventative measures are highlighted to reduce future similar incidents and assist with defending insurance claims when these occur. A programme of training has been developed and needs to be rolled out across the Directorates.

The total incident figure for 2011/12 has reduced in comparison to the previous 12 month period. Incidents recorded for employee's total 4227 compared to 4476 the previous year. This equates to a 5.6% reduction against our target of 6%. Overall incident rate per 1000 FTE's is 174/1000. This has increased slightly from previous year due to the overall LCC FTE figure being lower. Accident categories need to be analysed further with targeted work undertaken to try and reduce these figures further.

Contractor management remains a risk to the Authority. Increased monitoring and reporting on Contractors where there are failings to adhere to H&S is planned for this year.

The Councils health & safety management system still requires additions on ensuring consistent procedures are in place and are being followed by the services. Communication of these procedures remains a problem and better intranet and other communication technology needs to be explored.

The current accident/incident data base is not fit for purpose in terms of readily being able to access data and run reports for analysing incident information. The current database was developed as a temporary measure developed by an H&S team member due to the setting up of the BSC and the Council restructure. A report will be submitted as a business case to look at the options for a new database.

## Further information

Further information can be obtained from Jeff Thompson, HR Manager Health & Safety, on (0113) 22 43647.