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ADDITIONAL CIRCULATION - Risk 6 Updated



To: Members of the Risk Audit and Performance Committee

Town House, ABERDEEN, 21 August 2020

RISK, AUDIT AND PERFORMANCE COMMITTEE

The undernoted items are circulated in connection with the meeting of the <u>RISK</u>, <u>AUDIT AND PERFORMANCE COMMITTEE</u> to be held on <u>WEDNESDAY</u>, <u>26 AUGUST</u> 2020 at 10.00 AM.

FRASER BELL CHIEF OFFICER - GOVERNANCE

BUSINESS

5 Strategic Risk Register - HSCP 20.027 (Pages 3 - 24)

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Strategic Risk Register

Revision	Date
1.	March 2018
2.	September 2018
3.	October 2018 (IJB & APS)
4	February 2019 (APS)
5.	March 2019 (IJB)
6.	August 2019 (APS)
7.	October 2019 (LT)
8.	November 2019 (IJB
	workshop)
9.	January 2020 (ahead of
	IJB)
10	March 2020
11	July 2020

Introduction & Background

This document is made publicly available on our website, in order to help stakeholders (including members of the public) understand the challenges currently facing health and social care in Aberdeen.

This is the strategic risk register for the Aberdeen City Integration Joint Board, which lays the foundation for the development of work to prevent, mitigate, respond to and recover from the recorded risks against the delivery of its strategic plan.

Just because a risk is included in the Strategic Risk Register does not mean that it will happen, or that the impact would necessarily be as serious as the description provided.

More information can be found in the Board Assurance and Escalation Framework and the Risk Appetite Statement.

Appendices

- Risk Tolerances
- Risk Assessment Tables



Colour - Key

Risk Rating	Low	Medium	High	Very High
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Risk Movement		Decrease	No Change	Increase

Risk Summary:

1	There is a risk that there is insufficient capacity in the market (or appropriate infrastructure in-house) to fulfil the IJB's duties as outlined in the integration scheme. This includes commissioned services and general medical services.	High
2	There is a risk of financial failure, that demand outstrips budget and IJB cannot deliver on priorities, statutory work, and projects an overspend.	Very High
3	There is a risk that the outcomes expected from hosted services are not delivered and that the IJB does not identify non-performance in through its systems. This risk relates to services that Aberdeen IJB hosts on behalf of Moray and Aberdeenshire, and those hosted by those IJBs and delivered on behalf of Aberdeen City.	High
4	There is a risk that relationship arrangements between the IJB and its partner organisations (Aberdeen City Council & NHS Grampian) are not managed to maximise the full potentials of integrated & collaborative working. This risk covers the arrangements between partner organisations in areas such as governance; corporate service; and performance.	Low
5	There is a risk that the IJB, and the services that it directs and has operational oversight of, fail to meet both performance standards/outcomes as set by regulatory bodies and those locally-determined performance standards as set by the board itself. This may result in harm or risk of harm to people.	Medium
6	There is a risk of reputational damage to the IJB and its partner organisations resulting from complexity of function, delegation and delivery of services across health and social care	Medium
7	Failure to deliver transformation at a pace or scale required by the demographic and financial pressures in the system	High
8	There is a risk that the IJB does not maximise the opportunities offered by locality working	High
9	There is a risk that if the System does not redesign services from traditional models in line with the current workforce marketplace in the City this will have an impact on the delivery of the IJB Strategic Plan.	Very High
10	There is a risk that ACHSCP is not sufficiently prepared to deal with the impacts of Brexit on areas of our business, including affecting the available workforce and supply chain.	High



Description of Risk: There is a risk that there is insufficient capacity in the market (or appropriate infrastructure in-house) to fulfil the IJB's duties as outlined in the integration scheme. Commissioned services in this context include third and independent providers of care and supported living and independent providers of general medical services, community optometry and general dental services. Additional pressures from other parts of the system also add to market instability. For example, recruitment of care staff within a competing market, reduction of available beds and the requirement to care for more complex people at home. Most recently, sustainability for providers of both care at home and care homes has been compromised by the impact of COVID-19, including access to the necessary PPE and associated costs incurred, staff availability due to blanket testing and the occupancy levels within some of our care homes.

Strategic Priority: Prevention and Communities **Risk Rating:** low/medium/high/very high HIGH

Risk Movement: increase/decrease/no change

NO CHANGE 20.07.20

Controls:

- Robust market and relationship management with the 3rd and independent sector and their representative groups, building a sense of shared risk, in an environment where people operate in a respectful and responsible fashion. In particular, with a sense of etiquette in the way in which businesses conduct themselves
- GP Contracts and Contractual Review and GP Sustainability Risk Review workforce and role review in primary care.
- Funding arrangements which take into account the annual increase to support payment of the Scottish Living wage
- Contact monitoring arrangements regular exchange of information between contracts and providers and progressing new contracts
- Clinical and care governance processes and the opportunity to provide assurance, including assurance that all appropriate leadership team members and staff have undertaken Adult Protection training.
- Leadership team monthly discussion of operational and strategic risk to ensure shared sense of responsibility and approach to potential challenging situations.

Leadership Team Owner: Lead Commissioner

Rationale for Risk Rating:

- There have been several experiences of provider failure in the past and this has provided valuable experience and an opportunity for learning. There is unmet need in the care sector evidenced by out of area placements and use of agency staff which would indicate that there are insufficient skills and capacity to meet the needs of the population
- There are difficulties in recruiting to vacant GP positions within the city which has led to GP practices closing
- Discussion with current providers and understanding of market conditions across the UK and in Aberdeen
- Impact of Living Wage on profitability depending on some provider models (employment rates in Aberdeen are high, care providers have to compete within this market)
- The impact of Covid-19 on providers is not yet fully quantifiable. Bed occupancy has reduced and costs have increased potentially through maintaining existing staffing levels and procuring PPE.
- The impact of Covid-19 on independent GP practices, community optometrists and general dental practitioners is not yet fully quantifiable. Should supply of these contracted services reduce due to financial constraints and businesses fail, there may be insufficient capacity to provide services to patients. The responsibility to ensure patients have access to these services rests with the Partnership.

Rationale for Risk Appetite:

As 3rd and independent sectors are key strategic partners in delivering transformation and improved care experience, we have a low tolerance of this risk. It is suggested that this risk tolerance should be shared right throughout the organisation, which may encourage staff and all providers of primary health and care services to escalate valid concerns at an earlier opportunity.

Mitigating Actions: The IJB's commissioning model has an influence on creating capacity and capability to

- manage and facilitate the market
- The development of virtual provider huddles
- The development of the local PPE hub
- Consortium of providers purchasing PPE
- Risk fund set aside with transformation funding
- Approved Reimaging Primary Care Vision and re-purposing the Primary Care Improvement Plan from August 2020.
- Implementation of GMS contract
- Remodelling of 2C practices
- Interim financial support from Scottish Government for community optometrists and general dental practitioners.
- Provider of last resort Bon Accord Care
- The development of risk predictor tools in association with the care inspectorate, and individual team escalation plans
- Reconciliation process working on a pan Grampian approach



Aberdeen City Health & Social Care Partnership

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- Close working between partnership (social work, medical and nursing practitioners), care inspectorate, and public health directorate
- Clinical and Health Protection Scotland Guidance for social care settings.

- Develop and implement the Residential Care Providers Early Warning System (once returned to new normal) with monthly returns from providers using MS Forms to gather intelligence and report to all relevant parties.
- Intervention by Scottish Ministers and Public Bodies where financial failure evident
- Grampian PH Team to provide advice on all aspects of prevention, testing and management of Covid incidences

All care home staff offered weekly Covid testing

Assurances:

- Market management and facilitation
- Inspection reports from the Care Inspectorate
- Contract monitoring process, including GP contract review visit outputs.
- Daily report monitoring
- Clinical oversight group daily meetings
- Good relationships with GP practices
- Links to Dental Practice Advisor who works with independent dentists
- Links to the Eye Health Network and Clinical Leads for Optometry in Shire & Moray and the overall Grampian Clinical Lead

Gaps in assurance:

- Market or provider failure can happen quickly despite good assurances being in place. For example, even with
 the best monitoring system, the closure of a practice can happen very quickly, with (in some cases) one
 partner retiring or becoming ill being the catalyst.
- Market forces and individual business decisions regarding community optometry and general dental practitioners cannot be influenced by the Partnership.
- We are currently undertaking service mapping which will help to identify any potential gaps in market provision

Current performance:

- Most social care services are commissioned from care providers. Commissioning is the largest part of our budget and accounts for over £100 million of our available budget.
- Additional costs incurred by residential providers to be supported by initial mobilisation funding provided by SG. Where care homes cannot occupy beds due to Covid-19 infection levels or other reasons, sustainability payments will be made to ensure the market is supported.
- GPs and their practice teams are open as usual during the pandemic but are operating a triage system using telephone and video appointments. Remote consulting initiatives such as Attend Anywhere and the use of GMEDs, and the OOH's base were activated to encourage cross sector working. All non-urgent home visits have been suspended and all remaining visits are conducted either by the practice themselves or by the City Visiting or Hospital at Home services in order to deliver a safe and contained service. Most visits are undertaken by the practice. City Visiting are focusing their work on Covid patients although they are now undertaking a small number of visits from 17 practices. Hospital at Home continue to take referrals.
- Community optometrists and general dental practitioners have been closed during lockdown but have been providing an emergency triage service for their own patients who have emergency or urgent need. They are reopening on a phased basis but it could be some time before aerosol generated procedures can be performed in the community. At the moment these procedures are being provided by the Public Dental Service.

- National Care Home Contract uplift for 2016/17 was 6.4% and 2.8% 2017/18.. NCHC uplift has been awarded for 2019/20. For other services (CAH, SL, Adult Res) a national agreement for a 3.3% uplift has exceptionally been agreed this year.
- IJB agreed payment of living wage to Care at Home providers for 2016/17, 2017/18 and 2018/19
- During the Covid-19 outbreak, the Care Inspectorate have scaled back inspection and complaints handling
 activity. This will allow providers to focus on support for commissioning bodies during the pandemic but may
 increase the risk that market failure is difficult to predict.
- Relationships between partnership and providers and between different providers have advanced over the past few months and there are good examples of providers working innovatively to support clients.
- Collaborative working between providers including consortium for PPE purchase
- Positive feedback from providers over the level of support offered to them.
- Continuing to progress the tender for Care at Home and Supported Living
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Budgets delegated to cost centre level and being managed by budget holders.

• Medium-Term Financial Strategy reviewed and approved at the IJB in March 2020.

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Description of Risk:	
There is a risk of IJB financial failure and projecting an overspend, due to demand outstripping available budg	
Strategic Priority: Prevention and Communities	Leadership Team Owner: Chief Finance Officer
Risk Rating: low/medium/high/very high	Rationale for Risk Rating:
VERY HIGH	 If the partnership does not have sufficient funding to cover all expenditure, then in order to achieve a sustainable balanced financial position, decisions will be required to be taken which may include reducing/stopping services
Risk Movement: increase/decrease/no change:	
	If the levels of funding identified in the Medium Term Financial Framework are not made available to the IJB
INCREASE 20/07/20	in future years, then tough choices would need to be made about what the IJB wants to deliver. It will be extremely difficult for the IJB to continue to generate the level of savings year on year to balance its budget.
	 The major risk in terms of funding to the Integration Joint Board is the level of funding delegated from the Council and NHS and whether this is sufficient to sustain future service delivery. There is also a risk of additional funding being ring-fenced for specific priorities and policies, which means introducing new projects and initiatives at a time when financial pressure is being faced on mainstream budgets. The cost of the IJB's (Covid-19) mobilisation plan is still to be fully determined. An initial payment of £1.85 million was received from the SG in May to support additional costs with a significant part of this now allocated to support sustainability of the commissioned providers. Until the funding and costs for COVID-19 is confirmed the risk of a financial shortfall in relation to the IJB finances is increased.
	Rationale for Risk Appetite:
	The IJB has a low-moderate risk appetite to financial loss and understands its requirement to achieve a balanced budget. The IJB recognises the impacts of failing to achieve a balanced budget on Aberdeen City Council & its bond – an unmanaged overspend may have an impact on funding levels.
	However the IJB also recognises the significant range of statutory services it is required to meet within that finite budget and has a lower appetite for risk of harm to people (low or minimal).
Controls:	Mitigating Actions:
 Financial information is reported regularly to the Risk, Audit and Performance Committee, the Integration Joint Board and the Leadership Team 	 The Leadership Team are committed to driving out efficiencies, encouraging self-management and moving forward the prevention agenda to help manage future demand for services. Lean Six Sigma methodology is being applied to carry out process improvements.
Risk, Audit & Performance receives regular updates on transformation programme & spend.	
 Approved reserves strategy, including risk fund 	 An early review has been undertaken of the financial position and was reported in June to the IJB. These figures will be firmed up and the chief officer and chief finance officer have been asked to report back to the IJB in August with options to close any shortfall
 Robust financial monitoring and budget setting procedures including regular budget monitoring & budget meeting with budget holders. 	in August with options to close any shortian



Assurances:	Gaps in assurance:
 Risk, Audit and Performance Committee oversight and scrutiny of budget under the Chief Finance Officer. 	 The financial environment is challenging and requires the IJB financially sustainable should not be underestimated.
Board Assurance and Escalation Framework.	 Financial failure of hosted services may impact on ability to deliver strategic ambitions.
Quarterly budget monitoring reports.	•
 Regular budget monitoring meetings between finance and budget holders. 	
Current performance:	Comments:
Year-end position for 2019/20	Regular and ongoing budget reporting and management scrutiny in place.
• The impact of the coronavirus on the finances of the IJB are largely unknown. Some of these	Budget monitoring procedure now well established.
financial consequences will receive additional funding from the Scottish Government, and an initial	Budget holders understand their responsibility in relation to financial management.
payment in support of mobilisation was received in May 2020. However, at this time although some	Scottish Government Medium Term H&SC Financial Framework – released and considered by APS Committee.
additional costs are known, many are yet to be determined. The level and timing of any further	
funding is currently unknown.	



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	transformation of services, or face service failure and that the IJB fails to identify such non-performance through its
	ts on behalf of Moray and Aberdeenshire, and those hosted by those IJBs and delivered on behalf of Aberdeen City.
Strategic Priority: Prevention and Connections.	Leadership Team Owner: Chief Officer
Risk Rating: low/medium/high/very high	Rationale for Risk Rating:
Nisk Nating. Towy medianty riight very mgm	Considered high risk due to the projected overspend in hosted services
HIGH	Hosted services are a risk of the set-up of Integration Joint Boards.
	Rationale for Risk Appetite:
Risk Movement: (increase/decrease/no change):	The IJB has some tolerance of risk in relation to testing change.
NO CHANGE 20.07.2020	
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Controls:	Mitigating Actions:
Integration scheme agreement on cross-reporting	This is discussed regularly by the three North East Chief Officers
North East Strategic Partnership Group	Regular discussion regarding budget with relevant finance colleagues.
Operational risk register	Chief Officers should begin to consider the disaggregation of hosted services.
Assurances:	Gaps in assurance:
These largely come from the systems, process and procedures put in place by NHS Grampian, which	There is a need to develop comprehensive governance framework for hosted services, including the roles
are still being operated, along with any new processes which are put in place by the lead IJB.	of the IJB's sub-committees.
North East Group (Officers only) led by the 4 pan-Grampian chief executives. The aim of the group is	
to develop real top-level leadership to drive forward the change agenda, especially relating to the	
delegated hospital-based services.	
A new role and remit for the Chairs and Vice Chairs of the three IJBs to come together. This is under	
development.	
Both the CEO group and the Chairs & Vice Chairs group meet quarterly. The meetings are evenly	
staggered between groups, giving some six weeks between them, allowing progressive work /	
iterative work to be timely between the forums. The dates are currently being arranged	
Operation Homefirst-Closer joint working across the 3 Health and Social Care Partnerships and the	
Acute Sector.	
Current performance:	Comments: • It is noted that NHS Grampian are currently undertaking an internal audit on the governance of hosted
• The projected overspend on hosted services is a factor in the IJB's overspend position. This may in future impact on the outcomes expected by the hosted services.	to shock that this Grampian are currently andertaking an internal dadic on the governance of hosted
 Hosted services includes SOARS, Sexual Health and from 1/4/20, Mental Health and Learning 	services.
Disability Services. All three have been impacted by the Coronavirus pandemic with covid positive	
patients at Woodend now transferred to ARI, Sexual Health Services temporarily relocated to	
Foresterhill Campus and a reduction of beds for LD patients at Cornhil with more reliance on	
community approaches.	
community approaches.	



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· · · · · · · · · · · · · · · · · · ·	sations (Aberdeen City Council & NHS Grampian) are not managed in order to maximise the full potential of integrated &	
collaborative working to deliver the strategic plan. This risk covers the arrangements between partner or		
Strategic Priority: Prevention, Resilience and Communities.	Leadership Team Owner: Chief Officer	
Risk Rating: low/medium/high/very high	Rationale for Risk Rating:	
Low	 Considered medium given the experience of nearly three years' operations since 'go-live' in April 2016. However, given the wide range and variety of services that support the IJB from NHS Grampian and Aberdeen City Council there is a possibility of services not performing to the required level. 	
Risk Movement: (increase/decrease/no change)	Rationale for Risk Appetite:	
Decreased 20.07.2020	There is a zero tolerance in relation to not meeting legal and statutory requirements.	
 UB Strategic Plan-linked to NHS Grampian's Clinical Strategy and the Local Outcome Improvement Plan (LOIP) IJB Integration Scheme IJB Governance Scheme including 'Scheme of Governance: Roles & Responsibilities'. Agreed risk appetite statement Role and remit of the North East Strategic Partnership Group in relation to shared services Current governance committees within IJB & NHS. Alignment of Leadership Team objectives to Strategic Plan RESILIENCE: The Grampian Local Resilience Partnership is part of the NSRRP. It is chaired by the Chief Executive of NHS Grampian and is the local forum for the Category 1 and 2 Responders including Aberdeer City Council; Aberdeenshire Council; The Moray Council; NHS Grampian; Police Scotland; Scottish Fire & Rescue Service; Scottish Ambulance Service; HM Coastguard; SEPA; MOD; and SSEN Strategic Response Team Tactical Response Team Operational Response Team 	 Regular and ongoing Chief Officer membership of Aberdeen City Council's Corporate Management Team and NHS Grampian's Senior Leadership Team Regular performance meetings between ACHSCP Chief Officer, Aberdeen City Council and NHS Grampian Chief Executives. Additional mitigating actions which could be undertaken include the audit programme and bench-marking activity with other IJBs. In relation to capital projects, Joint Programme Boards established to co-produce business cases, strategic case approved by IJB and economic, financial, commercial, management case approved by NHSG Board and ACC Committees 	
 Assurances: Regular review of governance documents by IJB and where necessary Aberdeen City Council & NHS Grampian. A review of the Scheme of Governance commenced in June 2019 and will be reported to the IJB in November 2019. 		
 Current performance: Most of the major processes and arrangements between the partner organisations have been tested for over two years of operation and no major issues have been identified. A review of the Integration Scheme has been undertaken and the revised scheme has been approved by NHSG, Aberdeen City Council & Scottish Government. However this does not remove the risk as processes within the IJB and partner organisations will continue to evolve and improve 		



• The Grampian LRP set up the Grampian Coronavirus Assistance Hub, a new website and phoneline providing information to people all across Grampian on how to access social, practical and emotional support COVID-19.



Description of Risk: There is a risk that the IJB, and the services that it directs and has operational oversight of, fail to meet both performance standards/outcomes as set by national and regulatory bodies and those locally-

determined performance standards as set by the board itself. This may result in harm or risk of harm to people. Strategic Priority: Prevention, Resilience, Personalisation, Connections and Communities. Leadership Team Owner: Lead Strategy & Performance Manager Risk Rating: low/medium/high/very high Rationale for Risk Rating: Service delivery is broad ranging and undertaken by both in-house and external providers. There are a variety of performance standards set both by national and regulatory bodies as well as those determined locally and there are a range of factors which may impact on service performance against these. Poor performance **MEDIUM** will in turn impact both on the outcomes for service users and on the reputation of the IJB/partnership. **Risk Movement:** (increase/decrease/no change) **NO CHANGE 20.07.2020 Rationale for Risk Appetite:** The IJB has no to minimal tolerance of harm happening to people as a result of its actions, recognising that in some cases there may be a balance between the risk of doing nothing and the risk of action or intervention. **Controls:** Mitigating Actions: • Fundamental review of key performance indicators reported Clinical and Care Governance Committee and Group Risk, Audit and Performance Committee Review of systems used to record, extract and report data Performance and Risk Management Group Review of and where and how often performance information is reported on and how learning is fed back into processes and procedures. Performance Framework Risk-assessed plans with actions, responsible owners, timescales and performance measures On-going work developing a culture of performance management and evaluation throughout the partnership Production of Performance Dashboard, presented to a number of groups, raising profile of performance and monitored by dedicated teams encouraging discussion leading to further review and development Linkage with ACC and NHSG performance reporting **Annual Report** Recruitment of additional temporary resource to drive performance and risk management process Chief Social Work Officer's Report Performance now a standing agenda item on Leadership Team meetings Ministerial Steering Group (MSG) Scrutiny **Internal Audit Reports** Links to outcomes of Inspections, Complaints etc. • Contract Management Framework **Assurances:** Gaps in assurance: • Joint meeting of IJB Chief Officer with two Partner Body Chief Executives. Formal performance reporting has not been as well developed as we had hoped. Focus/priorities have Agreement that full Dashboard with be reported to both Clinical and Care Governance Committee changed. Operation Home First is now driving a whole new suite of performance indicators although there are challenges in getting access to the data held by NHSG. Our key indicators will change and a refreshed and Audit & Performance Committee. Lead Strategy and Performance Manager will ensure both committees are updated in relation to the interest and activity of each. performance and Risk Management Group will lead the development of these. Annual report on IJB activity developed and reported to ACC and NHSG Work on understanding extent of operational performance reporting has stalled due to Covid 19 however will Care Inspectorate Inspection reports be picked up again as part of the Operation Home First reporting referred to above. Capture of outcomes from contract review meetings. External reviews of performance. Further work required on linkage to ACC, NHSG and CPA reporting. Benchmarking with other IJBs.



Aberdeen City Health & Social Care Partnership

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Current performance:

- Performance reports submitted to IJB, Audit and Performance Systems and Clinical and Care Governance Committees.
- Performance and Risk Management Group terms of reference and membership revised and regular meetings are now scheduled and taking place.
- Various Steering Groups for strategy implementation established and reviewing performance regularly.
- · Performance data discussed at team meetings.
- Close links with social care commissioning, procurement and contracts team have been established
- IJB Dashboard nearing completion. Dashboard has been shared widely.

Covid-19 Interim Arrangements

- The Terms of Reference-Interim Clinical and Care Governance Group CCGG)/Clinical Care Risk Management Group (CCRM)-were approved by the Leadership Team and the Clinical Care and Governance Committee.
- Remit of Group-The interim Group will consider:
 CCRM dashboard and real-time risk management/ Social care equivalent dashboard/risks, with each sector continuing to manage their own dashboard ahead of the fortnightly meeting. Representatives from the sectors will present/provide assurance to this Group
- Covid/ Non-Covid related clinical and care risks and assurance this will include taking cognisance
 of any new related guidance, impact of deployment/ interim ways of working, oversight of the
 disease modelling and impact of this, recovery/renewal phase (services that have been
 stopped/services to start first) etc
- Confirmation will be made at August IJB that we are now reverting to normal Standing Orders.
- Additional NHSG support from Medical, Nursing Director and Public Health re care homes via Grampian oversight group.

- During the Covid-19 outbreak, Healthcare Improvement Scotland has reduced the reporting requirements
 placed on partnerships so that resources are freed up to support frontline critical functions. It will be
 important to maintain scrutiny of performance data however so that the risk can continue to be mitigated.
- Annual Performance Report In relation to performance related to 2019/20, the intention is to prepare and
 publish the ACHSCP Annual Performance Report as usual although there is doubt over the availability of full
 year data due to ISD and Health Intelligence colleagues being diverted onto Covid-19 specific work. This may
 not necessarily be of the size or design originally intended due to the restricted availability of normal resource



Communications plan / communications manager

Description of Risk: There is a risk of reputational damage to the IJB and its partner organisations resulting from complexity of function, decision making, delegation and delivery of services across health and social care. Strategic Priority: All Leadership Team Owner: Communications Lead Risk Rating: low/medium/high/very high **Rationale for Risk Rating:** High Governance processes are in place and have been tested since go live in April 2017. Budget processes tested during approval of 3rd budget, which was approved. Risk rating has increased to acknowledge the complexity of operating in a Covid environment. Risk Movement: (increase/decrease/no change) **Rationale for Risk Appetite:** Increase 17.08.2020 Willing to risk certain reputational damage if rationale for decision is sound. **Controls: Mitigating Actions:** Leadership Team Clarity of roles IJB and its Committees • Staff and customer engagement - recent results from iMatter survey alongside a well-establish Joint Staff Operational management processes and reporting Forum indicate high levels of staff engagement. Effective performance and risk management Board escalation process To ensure that ACHSCP have a clear communication & engagement strategy, and a clear policy for social media Standards Officer role use, in order to mitigate the risk of reputational damage. **Locality Governance Structure** • Communications lead's membership of Leadership Team facilities smooth flow of information from all sections of the organisation Robust relationships with all local media are maintained to ensure media coverage is well-informed and accurate and is challenged when inaccurate/imbalanced. • Locality Empowerment Groups established in each of the three localities, ensuring effective two-way communication between the partnership, partner organisations and a wide range of community representatives in North, South and Central. Consultation and engagement exercises are also carried out with service users, staff and partners throughout service change processes to gain detailed feedback and Through the Locality Empowerment Groups help inform plans which will identify priorities to improve health and wellbeing for local communities, seeking the views and input of the public on these Groups. Gaps in assurance: **Assurances:** Role of the Chief Officer and Leadership Team None known at this time Role of the Chief Finance Officer Performance relationship with NHS and ACC Chief Executives



Current performance:

- Communications Officer in place to lead reputation management
- Regular and effective liaison by Communications Lead with local and national media during pandemic to: 1) mitigate potentially harmful media coverage of Partnership and care providers during the emergency; and 2) secure significant positive media coverage of effective activity by the Partnership and its partners during the Covid crisis, highlighting necessary changes to working practices and the work of frontline staff
- Partnership comms presence on the NHSG Comms Cell
- Close liaison with ACC and NHSG comms teams to ensure consistency of messaging and clarity of

- Communications strategy and action plan in place and being led by the HSCP's Communications Manager
- Communication and Engagement Group being strengthened by selection of 'Communications' Champions' across ACHSCP comprising of staff across the partnership to support us in ensuring key messages/internal news items are timely, appropriate and wide-reaching
- External and internal websites are regularly updated with fresh news/information; both sites continue to be developed and refined
- Locality Empowerment Groups established to build our relationship with communities and stakeholders
- Regular Chief Officer (CO) and Chief Executives (Ces) meeting supports good communication flow across partners as does CO's membership of the Corporate Management Teams of both ACC and NHSG



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Description of Risk:		
Failure of the transformation to delivery sustainable systems change, which helps the IJB deliver its strategic	priorities, in the face of demographic & financial pressures.	
Strategic Priority: All	Leadership Team Owner: Transformation Lead	
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Risk Rating: low/medium/high/very high	Rationale for Risk Rating:	
HIGH	Recognition of the known demographic curve & financial challenges, which mean existing capacity may	
	struggle	
Risk Movement: (increase/decrease/no change)	This is the overall risk – each of our transformation programme work streams are also risk assessed with some	
	programmes being a higher risk than others.	
NO CHANGE 20.07.2020	Rationale for Risk Appetite:	
	The IJB has some appetite for risk relating to testing change and being innovative.	
	The IJB has no to minimal appetite for harm happening to people – however this is balanced with a recognition	
	of the risk of harm happening to people in the future if no action or transformation is taken.	
	Although some transformation activity has speeded up due to necessity during the covid period, other	
	planned activity such as plans to increase staff attendance has not been possible as a direct result of Covid	
	implications.	
Controls:	Mitigating Actions:	
Transformation Governance Structure and Process	Programme management approach being taken across whole of the transformation programme	
Risk, Audit & Performance Committee – quarterly reports to provide assurance of progress	Transformation team in place and all trained in Managing Successful Programmes methodology	
Programme Board structure: Executive Programme board and portfolio programme boards are in	Regular reporting to Executive Programme Board and Portfolio Programme Boards	
place.	Regular reporting to Risk, Audit & Performance Committee and Integration Joint Board	
	Increased frequency of governance processes during Covid period – weekly Executive Programme Boards and	
	engagement and involvement of wider LT through daily LT huddles	
	A number of plans and frameworks have been developed to underpin our transformation activity across our wider system including: Programme for Transformation, Primary Care Improvement Plan, Action 15 Plan and	
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	intervention and prevention.	
Assurances:	Gaps in assurance:	
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cashable savings		
 Risk, Audit and Performance Committee Reporting Robust Programme Management approach supported by an evaluation framework IJB oversight Board escalation process Internal Audit has undertaken a detailed audit of our transformation programme. All recommendations from this audit have now been actioned. The Medium Term Financial Framework prioritises transformation activity that could deliver 	 wider system including: Programme for Transformation, Primary Care Improvement Plan, Action 15 Plan and Immunisation Blueprint. Transformation team amalgamated with public health and wellbeing to give greater focus to localities, early intervention and prevention. Gaps in assurance: 	



• The Medium Term Financial Framework, Operation Home First aims and principles, and Programme of Transformation have been mapped to demonstrate overall alignment to strategic plan.

Current performance:

- Demographic financial pressure is starting to materialise in some of the IJB budgets.
- **Covid-19 Developments**

Some transformation has taken place at an accelerated pace out of necessity to meet immediate demands of the Covid-19 situation. Examples of this include the rapid introduction and scale up of Near Me; the use of Microsoft Teams for remote meetings; roll out of additional technology to enable remote working; changes to the Immunisation Service, moving services such as nursing into locality operational teams etc. Some transformation activity that has been paused includes work to reduce sickness absence and use of locum staff. While some of the planned mitigations have been put in place to support staff, clearly with the levels of absence as a result of the pandemic and the pace at which it has been moving, it is difficult to undertake and measure impacts of any change in this area. The pace of other pieces of work such Action 15, PCIP and remodelling of 2C practices has slowed at the current time, although some aspects of these pieces of work have progressed

- Home First a number of projects aligned with Operation Home First and our strategic plan is placing a renewed focus on how we structure our resources.
- Accelerated delivery of Vaccination program.



-8-			
Description of Risk	- 0 -		
There is a risk that the IJB does not maximise the opportunities offered by locality working			
у по то			
Strategic Priority: All	Leadership Owner: Chief Officer		
Risk Rating: low/medium/high/very high			
	Rationale for Risk Rating:		
HIGH	Localities are in an early, developmental stage and currently require strategic oversight so are included in this rick register. Once they are expertional, they will be removed from the strategic rick register as a stand alone.		
Risk Movement: (increase/decrease/no change)	risk register. Once they are operational, they will be removed from the strategic risk register as a stand-alone item and will be included in the wider risk relating to transformation (risk 7).		
Nisk Movement: (mercuse) accrease, no change)	item and win be included in the wider risk relating to transformation (risk 7).		
NO CHANGE 20.07.2020	Rationale for Risk Appetite:		
	The IJB has some appetite to risk in relation to testing innovation and change. There is zero risk of financial failure or		
	working out with statutory requirements of a public body.		
Controls:	Mitigating Actions:		
IJB/Risk, Audit and Performance Committee	Continued broad engagement on locality working.		
Locality Empowerment Groups	Continued broad engagement of locality working.		
Strategic Planning Group			
Assurances:	Gaps in assurance		
Strategic Planning Group	Progress of developing and delivering locality plans.		
Comment and amount of the comment of	Community		
 Current performance: Locality Empowerment Groups commenced in March 2020. Engagement and involvement has 	 Comments: The LLGs will ensure locality plans align to the broader Aberdeen Community Planning plans and will use existing 		
 Locality Empowerment Groups commenced in March 2020. Engagement and involvement has been challenging as a result of physical distancing requirements due to Covid 	networks to maximise the potential of community and front line staff engagement. They will work alongside		
The groups have continued to meet virtually during this time.	operational locality delivery teams		
The response to Covid has enabled improved connections across our communities including			
volunteers, third sector and public sector agencies	As we move into the next phase of our community response in Covid-19 Update		
Work is ongoing jointly with Aberdeen City Council as part of Aberdeen Together to reduce			
complexity and duplication across the community and locality planning system.	working has been identified as one of 5 priority working groups.		
	All staff have now been aligned to a locality. This locality alignment is being built on through a number of projects		
	including: • Operation Homefirst USC priority workstream is testing and developing a locality-based MDT model of		
	 Operation Homefirst USC priority workstream is testing and developing a locality-based MDT model of delivery – hospital at home and enhanced community support. 		
	 Multi-Disciplinary Teams – through Aberdeen Together a test of change is being developed which will 		
	see conditions put in place for Aberdeen City Council and ACHSCP staff who support staff in a community		
	in Aberdeen to work in a more joined up manner in order to improve outcomes in a number of areas		
	including health and wellbeing		
	The Neighbourhood lead model that was implemented as part of the initial Covid Response is being		
	developed with a view to it being embedded within our business as usual structures		
	Nursing services have been more fully aligned around people in localities.		



	- 9 -
Description of Risk:	- 3-
There is a risk that if the System does not redesign services from traditional models in line with the	ne current workforce marketplace in the City this will have an impact on the delivery of the IJB Strategic Plan.
Strategic Priority: All	Leadership Team Owner: People & Organisation Lead
Risk Rating: low/medium/high/very high	Rationale for Risk Rating:
VERY HIGH	
	The current staffing complement profile changes on an incremental basis over time.
Risk Movement: (increase/decrease/no change)	 However the number of over 50s employed within the partnership (by NHSG and ACC) is increasing (i.e. 1 in 3 nurses are over 50).
NO CHANGE 20/07/2020	 Current high vacancy levels and long delays in recruitment across ACHSCP services.
110 011A110E 20/01/2020	Inability to fill vacancies
	Rationale for Risk Appetite:
	Risk should be able to be managed with the adoption of agile and innovative workforce planning structures and processes
Controls: • Clinical & Care Governance Committee reviews operational risk around staffing numbers	Mitigating Actions: • ACHSCP Workforce Plan
 Revised contract monitoring arrangements with providers to determine recruitment / retention trends in the wider care sector 	 Active engagement with schools to raise ACHSCP profile (eg Developing the Young Workforce, Career Ready)
 Establishment of Organisational Development Working Group Establishment of Performance Dashboard (considered by the Risk, Audit and Performance and Clinical and Care Governance Committees as well as the Leadership Team) 	 Active work with training providers and employers to encourage careers in Health and Social Care (eg Foundation Apprenticeships/Modern Apprenticeships through NESCOL, working with Department for Work and Pensions)
·	Greater use of commissioning model to encourage training of staff
	Increased emphasis on health/wellbeing of staff
	 Increased emphasis on communication with staff Greater promotion of flexible working
	 Greater promotion of nexible working increased collaboration and integration between professional disciplines, third sector, independent
	sector and communities through Localities.
	Increased monitoring of staff statistics (sickness, turnover, CPD, complaints etc) through Performance Pack to and identifier transfer.
	 Dashboard, identifying trends. Developing greater digitisation opportunities, e.g. using Text Messaging to shift emphasis from GPs to
	increased use of Texts for pharmacology
Assurances:	Gaps in assurance
ACHSCP Workforce Plan	 Need more information on social care staffing for Performance Dashboard Information on social care providers would be useful to determine trends in wider sector-For Performance Dashboard
Current performance:	Comments:
 Workforce planned developed for health and social care staff. Information expected from Scottish Government during over the next few months which should help improve workforce planning across all partnerships. 	



Aberdeen City Health & Social Care Partnership

A caring partnership

- High levels of locum use and nursing vacancies in the psychiatry service,
- 6 secondary schools have been visited by members of the Leadership Team between November 2019 and February 2020
- ACHSCP sickness absence rates to be updated and reported through the Performance Dashboard.

• Covid-19 Update

The emergency has resulted in a requirement for employees to embrace new methods of carrying out their duties, whether this has involved 7-day rostering, remote working or increased flexibility and mobility. Some employees have been redeployed to pressured services during the pandemic. As we move into the next phase of our community response in partnership with the City Council and linked to the Care for People group, locality development and locality working has been identified as one of 5 priority working groups. There is uncertainty regarding the challenges coming in the winter period specifically around managing any local increase in Covid cases, flu outbreak, and increase in health issues caused by lockdown health debt. These could all have an impact on how staff are utilised in the coming months.



10

Description of Risk: There is a risk that ACHSCP is not sufficiently prepared to deal with the impacts of Brexit on areas of our business, including affecting the available workforce and supply chain.

Whilst the impact on health and social care services of leaving the EU is impossible to forecast, it is clear that a number of issues will need to be resolved. Key areas for health and social care organisations to consider include: staffing; medical supplies; accessing treatment; regulation (such as working time directive and procurement/competition law, for example); and cross border issues.

Strategic Priority: Resilience and Communities.

Risk Rating: low/medium/high/very high

Rationale for Risk Rating:

There is still a high level of uncertainty around 'Brexit' as impacts are difficult to forecast.

Risk Movement: (increase/decrease/no change)

NO CHANGE 20.07.2020

Controls:

- NHSG have held a voluntary survey of EU nationals. ACC currently undertaking a survey of all staff to gather similar information.
- NHSG An initial operational assessment has been undertaken. A BREXIT co-ordinating group established with executive leadership. Engagement with staff who may be impacted by withdrawal of UK from the EU. Co-ordination with professional leads across Scotland and at SG - procurement, medicines, staff and resilience
- ACC- A Brexit Steering Group has been established. The Partnership is a member of this Group.
- National Procurement of NHS National Services Scotland has been working with Scottish Government, NHS Scotland Health Boards, DHSC and suppliers to try to minimise the impact of EU Exit on the supply of Medical Devices & Clinical Consumables. Activities range from increased stock holding in items supplied from our own National Distribution Centre to UK wide participation in centralised stock building and supplier preparedness.
- The Partnership has established an Incident Management Team (IMT) ahead of daily reporting being re-established. The IMT will report through both the ACC and NHSG routes, as required.

Mitigating Actions:

• Mitigating actions have been developed on a national and local level through Scottish Government guidance and the ACC and NHSG EU exit steering groups respectively. These actions are linked to the Scottish Planning Assumptions (based on the reasonable worst case scenario-no deal).

The assumptions are:

- Travel, Freight and Borders
- Disruption of Services
- · Information and Data Sharing
- · Demonstrations and Disorder
- · Remote and Rural Scotland
- Scottish Workforce
- As the Partnership does not directly employ staff, The Chief Officer will work closely with partners to ensure that as implications become clear the Partnership are able to best represent and meet the needs of all staff
- The Partnership's Business Continuity Planning process is established which will identify key services to prioritise in any contingency event.
- •Review ALEO contingency plans. Request evidence of risk assessment and mitigation from ALEOS for assurance of ability to deliver against contract. This is being considered and scrutinised through the ALEO Hub governance arrangements.
- •Survey of providers asking key questions on preparedness.
- The Partnership have taken part in reporting any EU exit implications through both the NHSG and ACC routes. The reporting timescales were roughly the same (around the previous 3 political deadlines in March, April and October 2019). No EU exit implications were reported by the Partnership at these times.

Assurances:

Understanding that current legislation will remain in effect immediate post Brexit

Gaps in assurance:

· Uncertainty of final trade agreement with EU.



Current performance:

Aberdeen City Council have restarted their EU Exit Working Group and will meet on the 28th of July 2020. The purpose of the Group is detailed below:

The EU-Exit Group will support the Senior Responsible Owner (SRO) to identify, plan and manage the impacts of the EU-Exit affecting the Council (ACC) and its Partner Organisations.

The Group will provide CMT Stewardship and the SRO with assurance that risks are identified. assessed and that plans are in place to mitigate the impacts as far as is practical. The Group will review and manage EU Exit risks contained within the Risk Register and recommend when risks should be escalated and/or de-escalated in accordance with Risk Management Policy and Guidance.

The Group will also identify opportunities arising from an EU Exit and share these with the relevant Functions, Clusters and/or Partner Organisations.

In terms of NHSG, the Partnership is working closely with the Head of Procurement. The latest update is that resumption of the planning activities at a national level have re-commenced. The hub that was set up on freight route contingencies and the building of contingency stock at national level are in the process of being re-initiated.

It was also noted from prior Brexit preparations and from Covid19 supply response lessons learned that the Social Care Sector supply chain for Care Homes was less prepared and had been provided with co-ordinated support for PPE etc from National Procurement on behalf of the Scottish Government. The possibility of this type of support being provided through the exit from the EU is also being discussed.

Comments:

ACHSCP colleagues will need to ensure continued engagement with ACC and NHSG working groups.



Appendix 1 – Risk Tolerance

Level of Risk	Risk Tolerance
Low	Acceptable level of risk. No additional controls are required but any existing risk controls or contingency plans should be documented. Chief Officers/Managers/Risk Owners should review these risks applying the minimum review table within the risk register process document to assess whether these continue to be effective.
Medium	Acceptable level of risk exposure subject to regular active monitoring measures by Managers/Risk Owners. Where appropriate further action shall be taken to reduce the risk but the cost of control will probably be modest. Managers/Risk Owners shall document that the risk controls or contingency plans are effective. Chief Officers/Managers/Risk Owners should review these risks applying the minimum review table within the risk register process document to assess whether these continue to be effective.
High	Relevant Chief Officers/Managers/Directors/Assurance Committees will periodically seek assurance that these continue to be effective. Further action should be taken to mitigate/reduce/control the risk, possibly urgently and possibly requiring significant resources. Chief Officers/Managers/Risk Owners must document that the risk controls or contingency plans are effective. Managers/Risk Owners should review these risks applying the minimum review table within the risk register process document to assess whether these continue to be effective. Relevant Chief Officers/Managers/Directors/Executive and Assurance Committees will periodically seek assurance that these continue to be effective and confirm that it is not reasonably practicable to do more. The IJB's may wish to seek assurance that risks of this level are being effectively managed. However the IJB's may wish to accept high risks that may result in reputation damage, financial loss or exposure, major breakdown in information system or information integrity, significant incidents(s) of regulatory non-compliance, potential risk of injury to staff and public
Very High	Unacceptable level of risk exposure that requires urgent and potentially immediate corrective action to be taken. Relevant Chief Officer/Managers/Directors/Executive and Assurance Committees should be informed explicitly by the relevant Managers/Risk Owners. Managers/Risk Owners should review these risks applying the minimum review table within the risk register process document to assess whether these continue to be effective. The IJB's will seek assurance that risks of this level are being effectively managed. However the IJB's may wish to accept opportunities that have an inherent very high risk that may result in reputation damage, financial loss or exposure, major breakdown in information system or information integrity, significant incidents(s) of regulatory non-compliance, potential risk of injury to staff and public



Appendix 2 – Risk Assessment Matrices (from Board Assurance & Escalation Framework)

Table 1 - Impact/Consequence Defintions

Descriptor	Negligible	Minor	Moderate	Major	Extreme
Patient Experience	Reduced quality of patient experience/ clinical outcome not directly related to delivery of clinical care.	Unsatisfactory patient experience/clinical outcome directly related to care provision – readily resolvable. Unsatisfactory patient experience/clinical outcome, short term effects – expect recovery <1wk.		Unsatisfactory patient experience/ clinical outcome; long term effects –expect recovery >1wk.	Unsatisfactory patient experience/clinical outcome, continued ongoing long term effects.
Objectives/ Project	Barely noticeable reduction in scope, quality or schedule.	Minor reduction in scope, quality or schedule.	Reduction in scope or quality of project; project objectives or schedale.	Significnt project over-run.	Inability to meet project objectives; reputation of the organisation seriously damaged.
Injury (physical and psychological) to patient/ visitor/staff.	Adverse event leading to s minor injury not requiring firt &d	Minor injury or illness, firt á d treatment required.	Agency reportable, e.g. Police (niolent and aggressive acts). Significnt in u y requiring medical treatment and/or counselling.	Major injuries/long term incapacity or disability (loss of limb) requiring medical treatment and/or counselling.	Incident leading to death or major permanent incapacity.
Complaints/ Claims	Locally resolved verbal complaintd	Justifie written complant peripheral to clinical care.	Below exdess claim. Justifie complaint involving lack of appropriate care.	Claim above exces s level. Multiple justifie comp l à n s	Multiple claims d r single major claim. Complex justifie comp l å t .
Service/ Business Interruption	Interruption in a service which does not impact on the delivery of patient care or the ability to continue to provide service.	Short term disruption to service with minor impact on patient care.	Some disruption in service with unacceptable impact on patient care. Temporary loss of ability to provide service.	Sustained loss of service which has serious impact on delivery of patient care resulting in major contingency plans being invoked.	Permanent loss of core service or facility. Disruption to facility leading to signifight "knock σ" gf fect.
Staffin and Competence	Short term low staffin level temporarily reduces sergice quality (< 1 day). Short term low staffin level (>1 day), where there is no disruption to patiergit care.	Ongoing low staffin level reduces service quality Minor error due to ineffective training/implementation of training.	Late delivery of key objective/ service due to lack of staff. Moderate error due to ineffective training/ implementation of training. Ongoing@roblems with staffin level s	Uncertain delivery of key objective /service due to lack of staff. Major error due to ineffective training/implementation of training.	Non-delivery of key objective/ service due to lack of staff. Loss of key staff. Critical error due to ineffective training / implementation of training.
Financial (including damage/loss/ fraud)	Negligible organisational/ personal finnci al loss (£<1k).	Minor organisational/ personaldinnci à loss (£1- 10k).	Significnt or gani sational / personal finnci à loss (£10-100k).	Majar organisational/personal finnci à loss (£100k-1m).	Severe organisational/ personal finnci à loss (£>1m).
Inspection/Audit	Small number of recommendations which focus on minor quality improvement issues.	Recommendations made which can be addressed by low level of management action.	Challenging recommendations that can be addressed with appropriate action plan.	Enforcement action. Low rating. Critical report.	Prosecution. Zero rating. Severely critical report.
Adverse Publicity/ Reputation	Rumours, no media coverage. Little effect on staff morale.	Local media coverage – short term. Some public embarrassment. Minor effect on staff morale/ public attitudes.	Local media – long-term adverse aublicity. Significnt & fect on staff morale and public perception of the organisation.	National media/adverse publicity, less than 3edays. Public confidnce in the organisation undermined. Use of services affected.	National/International media/ adverse publicity, more than 3 days. MSP/MP concern (Questions in Parliament). Court Enforcement. Public Enquiry/FAI.

Table 2 - Likelihood Defintions

Descriptor	Rare	Unlikely	Possible	Likely	Almost Certain
Probability	Can't believe this event would happen Will only happen in exceptional circumstances.	Not expected to happen, but definte pot ent id exists Unlikely to occur.	May occur occasionally Has happened before on occasions Reasonable chance of occurring.	Strong possibility that this could occur Likely to occur.	This is expected to occur frequently/in most circumstances more likely to occur than not.

Table 3 - Risk Matrix

Likelihood	Consequences/Impact				
	Negligible	Minor	Moderate	Major	Extreme
Almost Certain	Medium	High	High	V High	V High
Likely	Medium	Medium	High	High	V High
Possible	Low	Medium	Medium	High	High
Unlikely	Low	Medium	Medium	Medium	High
Rare	Low	Low	Low	Medium	Medium

References: AS/NZS 4360:2004 'Making It Work' (2004)

Table 4 - NHSG Response to Risk

Describes what NHSG considers each level of risk to represent and spells out the extent of

Level of Risk	Response to Risk
Low	Acceptable level of risk. No additional controls are required but any existing risk controls or contingency plans should be documented. Managers/Risk Owners should review these risks applying the minimum review table within the risk register process document to assess whether these continue to be ef fective.
Medium	Acceptable level of risk exposure subject to regular active monitoring measures by Managers/Risk Owners. Where appropriate further action shall be taken to reduce the risk but the cost of control will probably be modest. Managers/Risk Owners shall document that the risk controls or contingency plans are ef fective. Managers/Risk Owners should review these risks applying the minimum review table within the risk register process document to assess whether these continue to be ef fective. Relevant Managers/Directors/Assurance Committees will periodically seek assurance that these continue to be effective.
High	Further action should be taken to mitigate/reduce/control the risk, possibly urgently and possibly requiring significnt resources. Managers/Risk Owners must document that the risk controls or contingency plans are effective. Managers/Risk Owners should review these risks applying the minimum review table within the risk register process document to assess whether these continue to be effective. Relevant Managers/Directors/Executive and Assurance Committees will periodically seek assurance that these continue to be effectiven and confirent at it is not reasonably practicable to do more. The Board may wish to seek assurance that risks of this level are being effectively managed. However NHSG may wish to accept high risks that may result in reputation damage, finnct a loss or exposure, major breakdown in information system or information integrits, significant incidents(s) of regulatory non-compliance, potential risk of injury to staff and public.
Very High	Unacceptable level of risk exposure that requires urgent and potentially immediate corrective action to be taken. Relevant Managers/Directors/E xecutive and Assurance Committees should be informed explicitly by the relevant Managers/Risk Owners. Managers/Risk Owners should review these risks applying the minimum review table within the risk register process document to assess whether these continue to be effective. The Board will seek assurance that risks of this level are being effectively managed. However NHSG may wish to accept opportunities that have an inherent very high risl that may result in reputation damage, finncial loss or exposure, major breakdown information system or information integrity, significnt incidents(s) of regulatory non compliance, potential risk of injury to staff and public.