

# **HEALTH AND SOCIAL CARE MORAY STRATEGIC RISK REGISTER**

**AS AT 10 JUNE 2020**

## RISK SUMMARY

1. The Moray Integration Joint Board (MIJB) does not function as set out within the Integration Scheme, Strategic Plan and in-line with Standing Orders and fails to deliver its objectives or expected outcomes.
2. There is a risk of MIJB financial failure in that the demand for services outstripping available financial resources. Financial pressures being experienced by the funding Partners will directly impact on decision making and prioritisation of MIJB.
3. Inability to recruit and retain qualified and experienced staff to provide safe care whilst ensuring staff are fully able to manage changes resulting from integration.
4. Inability to demonstrate effective governance and effective communication and engagement with stakeholders.
5. Inability to cope with unforeseen external emergencies or incidents as a result of inadequate emergency and resilience planning.
6. Risk to MIJB decisions resulting in litigation/judicial review. Expectations from external inspections are not met.
7. Inability to achieve progress in relation to national Health and Wellbeing Outcomes. Performance falls below acceptable level.
8. Inability to progress with delivery of Strategic Objectives and Transformation projects as a result of inability to resolve data sharing and data security requirements.
9. Requirements for support services are not prioritised by NHS Grampian and Moray Council.

<b>RISK RATING</b>	<b>LOW</b>	<b>MEDIUM</b>	<b>HIGH</b>	<b>VERY HIGH</b>
<b>RISK MOVEMENT</b>	<b>DECREASE</b>	<b>NO CHANGE</b>	<b>INCREASE</b>	

The process for managing risk is documented out with the MIJB Risk Policy.

1	
<b>Description of Risk:</b> <i>Political</i>	The Integration Joint Board (IJB) does not function as set out within the Integration Scheme, Strategic Plan and Scheme of Administration and fails to deliver its objectives or expected outcomes.
<b>Lead:</b>	Chief Officer
<b>Risk Rating:</b>	Low/ medium/ high/ very high <span style="float: right; background-color: yellow;"><b>MEDIUM</b></span>
<b>Risk Movement:</b>	Increase/ decrease/ no change <span style="float: right; background-color: orange;"><b>NO CHANGE</b></span>
<b>Rationale for Risk Rating:</b>	The strategic plan has been reviewed and new plan launched in December 2019. Membership of IJB committees has been stable and the majority of members have attended several cycles of meetings. <b>Due to the ongoing Covid 19 response, normal business has suspended and emergency arrangements have been implemented for IJB with weekly meetings of Chair/Vice Chair and Chief Officer. Interim arrangements have been implemented for briefings to Clinical &amp; Care Governance Chair and Audit, Performance and Risk items are considered at the IJB meetings.</b>
<b>Rationale for Risk Appetite:</b>	The MIJB has zero appetite for failure to meet its legal and statutory requirements and functions.
<b>Controls:</b>	<ul style="list-style-type: none"> <li>• Integration Scheme.</li> <li>• Strategic Plan “Partners in Care” 2019 to 2029</li> <li>• Governance arrangements formally documented and approved.</li> <li>• Agreed risk appetite statement.</li> <li>• Performance reporting mechanisms.</li> <li>• Consultation with legal representative for all reports to committees and attendance at committee for key reports.</li> </ul>
<b>Mitigating Actions:</b>	<p>Induction sessions are held for new IJB members. IJB voting member briefings are held regularly. Conduct and Standards training held for IJB Members July 18 with updates provided by Legal Services as appropriate.</p> <p>SMT regular meetings and directing managers and teams to focus on priorities.</p> <p>Regular development sessions held with IJB and System Leadership Group Strategic Plan has been developed. New management structure is in place and wider system re-design and transformation governance structures being developed for implementation at the same time. The work that has been</p>

	progressed through need arising from the Covid19 response has escalated developments in some areas as a matter of priority. This has been done through collaborative working with partner organisations and the third sector.
<b>Assurances:</b>	<ul style="list-style-type: none"> <li>• Audit, Performance and Risk Committee oversight and scrutiny.</li> <li>• Internal Audit function and Reporting</li> <li>• Reporting to Board.</li> </ul>
<b>Gaps in assurance:</b>	None known
<b>Current performance:</b>	<p>Scheme of administration is reported when any changes are required. An initial meeting has been held with legal advisors to establish the governance requirements for the review of the integration scheme in relation to the proposed delegation of Children's and Criminal Justice Services.</p> <p>Report presenting the Strategic Plan, Communication Strategy, Organisational Development and Workforce Plans, Performance Framework and the draft Transformational Plan were presented and approved at MIJB on 28 November 2019</p> <p>Report on Standards Officer agreed by IJB March 2019</p>
<b>Comments:</b>	Strategic Planning and Commissioning Group approved the generic Terms of Reference and Chairs of the transformation boards at the meeting on 19 December 2019. It was intended that these boards would be established by April 2020 however this work has been on hold due to Covid19 and is being restarted but will incorporate the changes Covid is causing on ways of working.

<b>2</b>	
<b>Description of Risk:</b> <i>Financial</i>	There is a risk of MIJB financial failure in that the demand for services outstrips available financial resources. Financial pressures being experienced both by the funding Partners and Community Planning Partners will directly impact on decision making and prioritisation of MIJB.
<b>Lead:</b>	Chief Officer/Chief Financial Officer
<b>Risk Rating:</b>	Low/ medium/ high/ very high <b>VERY HIGH</b>
<b>Risk Movement:</b>	Increase/ decrease/ no change <b>NO CHANGE</b>
<b>Rationale for Risk Rating:</b>	<p>Previous funding cuts from Moray Council have been significant 2017/18 (£1.3m) and 2018/19 (£1.759m Gross). The 2019/20 settlement saw additional investment for health and social care. Although this was passed through to the MIJB there remains a significant funding gap as much of the new investment related to new commitments. Financial settlements are set to continue on a one year only basis, which does not support sound financial planning</p> <p>Demand on services continues to rise and the IJB has no remaining reserves to be utilised other than a reserve of £0.187M as at 1 April 2020, earmarked for the Primary Care Improvement Fund as directed by Scottish Government</p>

	<p>At the end of Qtr 4 in the 2018/19 financial year the IJB had an overspend of £1.2m This deficit was requested to be funded by the partners in the agreed proportionate split as per the Integration Scheme. This resulted in NHSG contributing £751k and Moray Council £441k. The recovery plan has been developed and was agreed with the Finance Directors in the partner organisations and presented to the MIJB in November 2018 and continues to be monitored throughout the 19/20 financial year. The draft annual accounts are currently being produced. The reported deficit as at 31.3.20 is an overspend of £2.073M, for the 2<sup>nd</sup> consecutive year, NHSG and Moray Council are required to meet this deficit, for 19/20 the amounts are £1.306M and £0.767M respectively. In addition to existing financial challenges, the Covid-19 pandemic brings with it additional financial burden, which as yet is not quantifiable. The Chief Financial Officer has introduced processes for recording the costs of Covid -19 which are being monitored weekly. Regular discussions are taking place with Scottish Government and financial returns in support of Mobilisation Plan are being made at regular intervals. There is a risk to the delivery of the MIJB 19/20 savings plan – this has been highlighted to Government, the IJB and the Senior management team are working to address through other actions.</p>
<b>Rationale for Risk Appetite:</b>	<p>MIJB recognises the pressures on the funding partners but also recognises the significant range of statutory services and nationally agreed contracts it is required to deliver on within that finite budget. MIJB has expressed a zero appetite for risk of harm to people. Covid-19 places additional risk on the MIJB finances</p>
<b>Controls:</b>	<p>Chief Finance Officer appointed - this role is crucial in ensuring sound financial management and supporting financial decision making, budget reporting and escalation.          Corrective action has been implemented through correspondence with budget holders and increased scrutiny at senior management level. Recovery Plan agreed and being monitored regularly. In October 2019, the MIJB approved the Medium Term Financial Framework that aims to support delivery of the Strategic Plan. The CFO and Senior Management Team are working to address the budget shortfall. A revised Financial Framework will be developed to support the emerging situation</p>
<b>Mitigating Actions:</b>	<p>Risk remains of the challenge that the MIJB can deliver transformation and efficiencies at the pace required. Financial information is reported regularly to both the MIJB, Senior Management Team and System Leadership Group.</p> <p>The Chief Officer and Chief Financial Officer (CFO) continue to engage in finance discussions with key personnel of both NHS Grampian and Moray Council. These conversations continue following the 2019/20 outturn position and as we respond to the COvid-19 pandemic.</p> <p>Chief Officer and CFO will continue to engage with the partner organisations in respect of the financial position throughout the year with a focus on the savingsplan. Cross partnership finance meetings have been put in place on a quarterly basis with partner CEOs, Finance Directors and the Chair/Vice Chair of the IJB.</p>

	The MIJB is acutely aware of the recurring overspend on its core services and continues to work to address this underlying issue.
<b>Assurances:</b>	MIJB oversight and scrutiny of budget. Reporting through MIJB, NHS Grampian Board and Moray Council.
<b>Gaps in assurance:</b>	None known
<b>Current performance:</b>	Budget Outturn for 2019/20 has seen an overspend after consideration of strategic funds of £2.073m. This was met by NHSG and MC in the agreed proportions of 63% / 37% respectively as per the Integration Scheme. Plans are being progressed in relation to service planning and financial review during 2020/21.
<b>Comments:</b>	Senior managers to work with Chief Officer and Chief Financial Officer to address the continuing financial challenge and forecast overspend as we progress through the current pandemic. Through reporting, regular updates will be provided to the MIJB, Moray Council and NHS Grampian as part of the risk sharing arrangement in place.

3	
<b>Description of Risk:</b> <i>Human Resources (People):</i>	Inability to recruit and retain qualified and experienced staff to provide safe care, whilst ensuring staff are fully able to manage change resulting from Integration
<b>Lead:</b>	Chief Officer
<b>Risk Rating:</b>	Low/ medium/ high/ very high <b>HIGH</b>
<b>Risk Movement:</b>	Increase/ decrease/ no change <b>NO CHANGE</b>
<b>Rationale for Risk Rating:</b>	<p>Existing issues with some front line services experiencing difficulties with recruitment to vacancies requiring specific skills and experience have not changed and this continues to place pressure on existing staff. In particular there is a significant issue around attracting people to work in Care at home teams. Workshops have been held in all localities but to date there has not been the increase in applications that is needed. The decision as a result of Covid19 to change the eligibility criteria to critical has reduced pressure on Care at home as there are less clients being provided a service.</p> <p>The difficulty with recruitment and retention of staff to caring roles is experienced by Care Homes and this can lead to an impact on HSCM teams where additional support may be required by the contractors. Covid 19 has the potential to cause severe disruption to staffing as Test, Trace and Isolate is implemented and managers are working as far as possible to mitigate any potential impact of a positive test result.</p>

	<p>The impact of budgetary decisions by the Council in relation to reducing staffing levels has reduced levels of support provided in some key areas for Health and Social Care Moray (HSCM), such as ICT, HR, Legal and design. Council services are still determining what elements of service provision need to reduce and we are working with these services to establish our level of support.</p>
<b>Rationale for Risk Appetite:</b>	<p>The MIJB is acutely aware of the lean management team in place and the strain this can place on the wider system.</p>
<b>Controls:</b>	<p>Management structure in place with updates reported to the MIJB.          Organisational Development plan in place and Workforce Plans are being updated to align to the new strategic plan.          Continued activity to address specific recruitment and retention issues. The chief social worker has reviewed the situation with managers and has employed a Consultant Practitioner to develop options for addressing some of the particular issues affecting social work services in Moray.          Management competencies continue to be developed through Kings Fund training although this is suspended due to Covid19.          Communications Strategy was approved in November 2019 and is being implemented.          Council and NHS performance systems in operation with HSCM reporting being further developed and information relating to vacancies, turnover and staff absences is integral to this. This has been expanded to collate details of staff shielding or isolating so arrangements can be made to utilise staff resources as effectively as possible.          SMT review vacancies and approve for recruitment</p>
<b>Mitigating Actions:</b>	<p>System re-design and transformation. Support has been provided from NHSG with transformation and our co-ordinated working with Dr Grays in a one system – one budget approach through the Moray Alliance.          Organisational Development Plan and Workforce plan has been updated and was approved by MIJB in November 2019. All Locality Managers are now in post with effect from January 2020.          Joint Workforce Planning is being undertaken albeit it suspended at present and the joint workforce forum which was re-established in September 2019 was suspended in March but will meet again later this month          Lead Managers are involved in regional and national initiatives to ensure all learning is adopted to improve this position.          Lead Managers and Professional Leads are linked to University Planning for intakes and programmes for future workforce development.</p>
<b>Assurances:</b>	<p>Normally there is operational oversight by Moray Workforce Forum and reported to MIJB. However currently the HSCM Response Group is overseeing matters arising as a result of Covid19 response.          Organisational Steering Group oversees any potential organisational change</p>
<b>Gaps in assurance:</b>	<p>Joint or single system not yet agreed for incident reporting.</p>
<b>Current performance:</b>	<p>iMatter survey undertaken during July 2019 across all operational areas showed improvement in response rate although there are still some teams that require to engage. Managers have worked with teams and developed action plans with</p>

	64% completed by the deadline in comparison to 50% in previous year. The Systems Leadership Group will be taking forward the implementation of the Organisational Development.
<b>Comments:</b>	<p>Staffing issues are owned by the Systems Leadership Group who will work collaboratively across the system to seek opportunities to make jobs more attractive where it has proved difficult to recruit.</p> <p>There has been considerable efforts by both NHS Grampian and Moray Council to provide staff for redeployment to frontline services in HSCM and we continue to be supported by some of these staff in key areas such as PPE Stores.</p>

<b>4</b>		
<b>Description of Risk:</b> <i>Regulatory:</i>	Inability to demonstrate effective governance and effective communication and engagement with stakeholders.	
<b>Lead:</b>	Chief Officer	
<b>Risk Rating:</b>	low/medium/high/very high	<b>MEDIUM</b>
<b>Risk Movement:</b>	increase/decrease/no change	<b>NO CHANGE</b>
<b>Rationale for Risk Rating:</b>	Locality planning assessed as medium in relation to ability to work at the pace required and current workforce capacity. Performance framework to be further developed from a planning perspective to show the links through operational service delivery to strategic objectives.	
<b>Rationale for Risk Appetite:</b>	The MIJB has a low risk appetite to failure.	
<b>Controls:</b>	<p>Communication and Engagement Strategy approved November 2019</p> <p>Annual Governance statement produced as part of the Annual Accounts 2018/19 and submitted to External Audit by the statutory deadline</p> <p>Performance reporting mechanisms in place and being further developed through performance management group.</p> <p>Community engagement in place for key projects areas such as Forres and Keith with information being made available to stakeholders and the wider public via HSCM website.</p>	
<b>Mitigating Actions:</b>	<p>Schedule of Committee meetings and development days in place and implemented.</p> <p>Good working relationship established with Audit Scotland, the MIJB's appointed external auditors since 16/17.</p> <p>Annual Performance Report for 2018/19 published in August 2019.</p>	



	Social media is actively used as a method of engaging with the public, with short videos focussing on particular services being trialled.
<b>Assurances:</b>	Oversight and scrutiny by Clinical and Care Governance Committee, Audit Performance and Risk Committee and MIJB. Summary reports of minutes of MIJB meetings are submitted to Council committee and NHS Board.
<b>Gaps in assurance:</b>	Progress on implementation of the Communication and Engagement Strategy has been impacted by the Covid 19. Emergency governance structure is in place so this does not provide the normal levels of engagement.
<b>Current performance:</b>	Communications Strategy was reviewed approved by IJB November 2019. Annual Performance Report 2018/19 published August 2019. Audited Accounts for 2018/19 were publicised by deadline 30 September 2019  Due to Covid19 there have been increased levels of briefings to staff, the public and Chair/Vice Chair of MIJB with a focus on the key elements of the response. Staff have been involved in co-ordinating services for and communicating with shielded and vulnerable people.
<b>Comments:</b>	A communication cell was established as part of the Local Resilience Partnership response with representation from Councils, HSCP and NHSG. This is being led by Aberdeen City Council and is an example of the collaborative working that has been taking place. This forum provides assurance that messages to all stakeholders are consistent. It also ensures that there is support for our Communications Officer and resilience provided with the access to other communication officers.

<b>5</b>	
<b>Description of Risk:</b> <i>Environmental:</i>	Inability to cope with unforeseen external emergencies or incidents as a result of inadequate emergency and resilience planning.
<b>Lead:</b>	Chief Officer
<b>Risk Rating:</b>	low/medium/high/very high <b>HIGH</b>
<b>Risk Movement:</b>	increase/decrease/no change <b>NO CHANGE</b>
<b>Rationale for Risk Rating:</b>	Due to the response requirements for Covid 19 progress has been made in a number of areas. SMOC information is updated, control room guidance updated and expanded, control centre protocols were implemented and remain in place and management teams have responded in an agile, responsive and collaborative way under very challenging conditions.

	<p>HSCM did not have a collectively approved list of critical functions at the start of the response however this was quickly completed and used to prioritise allocation of resources to the response. This list will be further developed to ensure it is robust for any type of disruptive event.</p>
<b>Rationale for Risk Appetite:</b>	<p>The MIJB understand the requirement to meet the statutory obligations set out within the Civil Contingencies Act and work with partner organisations to meet these obligations.</p>
<b>Controls:</b>	<p>Winter/Surge Plan updated and has been tested alongside NHSG plans for winter and officers have participated in exercises.</p> <p>HSCM Civil Contingencies group established and meeting regularly to address priority subjects.</p> <p>NHS Grampian Resilience Standards Action Plan approved (3 year).</p> <p>Business Continuity Plans in place for most services although overdue a review in some areas .</p>
<b>Mitigating Actions:</b>	<p>Information from the updated BIA/BCP has informed elements of the Winter Plan (Surge plan).</p> <p>A Friday huddle is in place which gathers the status of services across the whole system to provide information and contact details to the Senior Manager on Call (SMOC) over the weekend.</p> <p>NHS Grampian have amended their approach to Pandemic preparation so HSCM Pandemic plan requires redrafting and testing</p> <p>Practitioner group established for Moray with representation from HSCM, Dr Grays, Moray Council and NHSG to discuss matters arising from the Local Resilience Forum and within our respective organisations. In addition it will provide a forum for discussion of the linkages between organisational response plans to ensure there are no gaps or over reliance on particular local resources.</p>
<b>Assurances:</b>	<p>Audit, Performance and Risk Committee and NHS Grampian Civil Contingencies Group oversight and scrutiny.</p>
<b>Gaps in assurance:</b>	<p>Recent experience has highlighted the need for additional staff to be trained to be control centre managers, loggists and general awareness of response structures and meeting protocols. This will be incorporated into training schedules going forward.</p> <p>Some table top exercises have been completed but the intended programme for 2020 will require to be rescheduled once we are out of response phase.</p>

	<p>Progress has been made however further work is required to address the targets in the implementation plan that have not been met and the Resilience standards as identified by the NHSG Civil Contingencies Group.</p> <p>Pandemic flu plans will require to be updated with the learning from this incident</p>
<b>Current performance:</b>	<p>Many services have business continuity arrangements and some are overdue for an update. Work has progressed in identification of a critical functions list for agreement by System Leadership Group that will inform planning arrangements going forward. There will need to be changes made to business continuity plans following the implementation of additional ICT resources in services which have provided a greater deal of resilience for some services and functions – albeit reliant on electricity supply.</p> <p>Annual report on progress against NHS resilience standards was reviewed by APR committee in January 2020.</p>
<b>Comments:</b>	<p>Once the response phase is complete the HSCM Civil Contingencies group will schedule and review progress in achieving the NHSG resilience standards, reporting updates to System Leadership Group.</p>

6	
<b>Description of Risk:</b> <i>Reputational</i>	Risk to MIJB decisions resulting in litigation/judicial review. Expectations from external inspections are not met.
<b>Lead:</b>	Chief Officer
<b>Risk Rating:</b>	low/medium/high/very high <b>MEDIUM</b>
<b>Risk Movement:</b>	increase/decrease/no change <b>NO CHANGE</b>
<b>Rationale for Risk Rating:</b>	Considered medium risk due to the reporting arrangements being relatively new
<b>Rationale for Risk Appetite:</b>	The MIJB has some appetite for reputational risk relating to testing change and being innovative.  The MIJB has zero appetite for harm happening to people.
<b>Controls:</b>	Clinical and Care Governance (CCG) Committee established and future reporting requirements identified High and Very High operational risks are reviewed by System Leadership Group monthly and a review of all risks will be undertaken as part of the risk management framework. Complaints and compliments procedures in place and monitored. Clinical incidents and risks are being reviewed on a weekly basis to ensure processes are followed appropriately and consistently and responses are recorded in a timely manner. Adverse events and duty of candour procedures in place and being actioned where appropriate and summary reports submitted to CCG committee. Reports from external inspections reported to appropriate operational groups and by exception to SMT for subsequent reporting to CCG or Audit Performance and Risk Committee as appropriate.
<b>Mitigating Actions:</b>	This risk is discussed regularly by the three North East Chief Officers.  Additional resource has been allocated to support the analysis of information for presentation to CCG committee  Process for sign off and monitoring actions arising from Internal and External audits has been agreed
<b>Assurances:</b>	Audit, Performance and Risk and Clinical and Care Governance Sub-Committees oversight and scrutiny.
<b>Gaps in assurance:</b>	Process for highlighting recurring themes or strategic expectations from external inspections requires further development to ensure Committee has sight of significant issues.

<b>Current performance:</b>	External inspection reports are reviewed and actions arising are allocated to officers for taking forward. A summary of inspections was included in the Annual Performance report for 2018/19
<b>Comments:</b>	No major concerns have been identified for HSCM services in any audits or inspections this year.

7	
<b>Description of Risk:</b> <i>Operational Continuity and Performance:</i>	Inability to achieve progress in relation to national Health and Wellbeing Outcomes. Performance of services falls below acceptable level.
<b>Lead:</b>	Chief Officer
<b>Risk Rating:</b>	low/medium/high/very high <b>HIGH</b>
<b>Risk Movement:</b>	increase/decrease/no change <b>NO CHANGE</b>
<b>Rationale for Risk Rating:</b>	Potential impacts to the wide range of services in NHS Grampian and Moray Council commissioned by the MIJB arising from reductions in available staff resources as budgetary constraints impact. Unplanned admissions or delayed discharges place additional cost and capacity burdens on the service. As a result of a number of actions taken to respond to Covid19 including the opening of Duffus Wing and the interim change for Care at Home services to only be delivered to those people assessed with eligibility criteria as critical, the level of delayed discharges have decreased significantly.
<b>Rationale for Risk Appetite:</b>	Zero tolerance of harm happening to people as a result of action or inaction.
<b>Controls:</b>	Performance Management reporting framework. 2019 to 2029 “Partners in Care” Strategic Plan approved and Transformation Plan being developed. Performance regularly reported to MIJB. Revised Scorecard being developed to align to the new strategic priorities. Best practice elements from each body brought together to mitigate risks to MIJB’s objectives and outcomes. Chief Officer and SMT managing workload pressures as part of budget process.

<b>Mitigating Actions:</b>	<p>Service managers monitor performance regularly with their teams and escalate any issues to the Performance Management Group for further discussion to provide wider support, developing shared ownership and a greater understanding across the whole system.</p> <p>Key performance data is being circulated daily to all managers in a “Performance Flow” dashboard to ensure any potential issues are identified quickly so action can be taken.</p>
<b>Assurances:</b>	<p>Audit, Performance and Risk Committee oversight.        Operationally managed by service managers, receiving reports from Performance management group (which has a specific focus on performance). Strategic direction provided by Systems Leadership Group.</p> <p>HSCM Response Group was established and meets regularly to review the key performance information and actions that are required to deliver the priority services.</p>
<b>Gaps in assurance:</b>	<p>Development work in performance to establish clear links to describe the changes proposed by actions identified in the new Strategic Plan is on hold, but will re-commence shortly as plans for recovery are developed.</p>
<b>Current performance:</b>	<p>Covid19 has impacted on all areas of the service and work is underway to take the learning and experience gained during the response to collate performance information in dashboards to support managers interpret the impact of Covid19 on their services, now and going forward.</p> <p>There are likely to be changes to ways of working and this may also have impact on the performance information required.</p>
<b>Comments:</b>	<p>Work has progressed with development of performance monitoring and reporting of key performance indicators for locality managers.</p>

8	
<b>Description of Risk:</b> <i>ICT</i>	Inability to progress with delivery of Strategic Objectives and Transformation projects as a result of inability to resolve data sharing and data security requirements.
<b>Lead:</b>	Chief Officer
<b>Risk Rating:</b>	low/medium/high/very high <b>MEDIUM</b>
<b>Risk Movement:</b>	increase/decrease/no change <b>NO CHANGE</b>
<b>Rationale for Risk Rating:</b>	Corporate Information Security policies in place and staff are required to complete training and confirm they have read, understood and accept the terms of use.
<b>Rationale for Risk Appetite:</b>	MIJB has a low tolerance in relation to not meeting requirements.
<b>Controls:</b>	Computer Use Policies and HR policies in place for NHS and Moray Council and staff are required (through and automated process) to confirm they have read these every 6 months PSN accreditation secured by Moray Council Guidance regularly issued to staff. Guidance on effective data security measures issued to staff.
<b>Mitigating Actions:</b>	Integrated Infrastructure Group established, with ICT representation from NHSG and Moray Council, to consider and provide solutions to data sharing issues and ICT infrastructure matters. Linkages to Infrastructure board and Information sharing groups have been established albeit these meetings are not taking place regularly.  Data sharing groups for Grampian and Health and Social Care Moray have been established and meetings are held regularly. They will have oversight of any issues arising from Data protection and GDPR matters from either Council or NHS systems.
<b>Assurances:</b>	Strict policies and protocols in place with NHS Grampian and Moray Council.
<b>Gaps in assurance:</b>	Protocol for access to systems by employees of partner bodies to be documented. Information Management arrangements to be developed and endorsed by MIJB. Process of identification of issue and submission to data sharing group requires to be reinforced to ensure matters are progressed.
<b>Current performance:</b>	Training programme to be developed on records management, data protection and related issues for staff working across and between partners.
<b>Comments:</b>	Where national systems are involved it may not be possible to identify a solution however the issues will be able to be raised at the appropriate level via the Grampian Data Sharing Group where all three partnerships are represented.

9	
<b>Description of Risk:</b> <i>Infrastructure</i>	Requirements for support services are not prioritised by NHS Grampian and Moray Council.
<b>Lead:</b>	Chief Officer
<b>Risk Rating:</b>	low/medium/high/very high <b>HIGH</b>
<b>Risk Movement:</b>	increase/decrease/no change <b>INCREASING</b>
<b>Rationale for Risk Rating:</b>	<p>Changes to processes and necessary stakeholder buy-in still bedding in.</p> <p>Moray Council is undertaking a Property review of office and depot accommodation and the potential impact for HSCM services requires consideration. The output was anticipated in October 2019 however due to changes with roles and responsibilities within the Council it is not yet clear when the outcomes will be available for consultation. The changes required to places of work as a result of Covid19 will restrict the number of people that can use an office. These decisions are being made by NHSG and Moray Council and we await their assessment of what facilities we will have available.</p> <p>ICT infrastructure service plans in NHS Grampian and Moray Council are not yet visible to HSCM and development of communication and engagement process is required.</p> <p>Moray Council, in predicting a budget deficit for the current financial year have implemented special arrangements to ensure only essential expenditure is incurred. This includes the consideration to the deferring of projects already in the Capital plan.</p> <p>ICT resources are required for Council employed staff to enable them to work from home where the offices is not an option. The equipment is not yet readily available and it is likely to be 12-14 weeks before a resolution is available.</p>
<b>Rationale for Risk Appetite:</b>	Low tolerance in relation to not meeting requirements.
<b>Controls:</b>	<p>Chief Officer has regular meetings with partners</p> <p>Infrastructure Programme Board established with Chief Officer as Senior Responsible Officer/Chief Officer member of CMT. Process for submission of projects to the infrastructure board has approved and implemented to ensure appropriate oversight of all projects underway in HSCM.</p>
<b>Mitigating Actions:</b>	Dedicated project Manager in place – monitoring/managing risks of the Programme



	<p>Membership of the Board reviewed and revised to ensure representation of all existing infrastructure processes and funding opportunities.</p> <p>Process for ensuring infrastructure change/investment requests developed</p> <p>Infrastructure Manager linked into other Infrastructure groups within NHSG &amp; Moray Council to ensure level of 'gatekeeping'.</p> <p>Dr Grays site development plan is being produced collaboratively with input from NHSG and HSCM management.</p>
<b>Assurances:</b>	<p>Infrastructure Programme Board functions to provide robust governance and assurance that proposed projects have a robust business case and meets requirements of the respective partner organisations. This board reports to Strategic Planning and Commissioning Group.</p>
<b>Gaps in assurance:</b>	<p>Further work is required on developing the process for approval for projects so that they are progressed timeously.</p> <p>Need to review all existing processes in relation to infrastructure changes/projects/investments and streamline to avoid duplication of effort.</p> <p>Attendance at Infrastructure Board by NHS Grampian officers has reduced resulting in discussions at meetings being incomplete.</p> <p>Premises, Infrastructure and Digital Manager post that provides additional leadership in relation to major infrastructure projects is currently vacant.</p>
<b>Current performance:</b>	<p>The Infrastructure Board is currently suspended. Its purpose is for highlights/exceptions to be taken to SLG for communication and information purposes. Attendance at the Infrastructure Board meetings has reduced and the purpose and scope of this meeting is being reviewed as part of the governance arrangements relating to the developing Transformation Boards.</p>
<b>Comments:</b>	<p>Existing projects will be reviewed as part of the development of the transformation plans for the Strategic Plan to ensure resources are being dedicated appropriately and aligned to the emerging Strategic priorities.</p> <p>Contact has been made with Council ICT and discussions are underway regarding scoping specific support requirements of HSCM.</p>