

PHA Corporate Risk Register

Date of Review: 31 May 2020

PHA Corporate Risk Register v1.4 agreed by AMT 23 6 20 Page 1

Introduction

Managing risk is a key component of the wider governance agenda for the PHA. It is therefore essential that systems and processes are in place to identify and manage risks as far as reasonably possible.

The purpose of risk management is not to remove all risks but to ensure that risks are identified and their potential to cause loss fully understood. Based on this information, action can then be taken to direct appropriate levels of resource at controlling the risk or minimising the effect of potential loss.

The PHA has recognised the need to adopt such an approach and has a systematic and unified process in place to ensure a fully functioning risk register at both corporate and directorate levels as set out in the PHA Risk Management Srategy and Policy.

The Corporate Register that follows identifies corporate risks, all of which have been assessed using a 'five by five' risk grading matrix (see below) which is in line with DoH guidance. This ensures a consistent and uniform approach is taken in categorising risks in terms of their level of priority so that appropriate action can be taken at the appropriate level of the organisation.

IMPACT	Risk Quantification Matrix				
5 - Catastrophic	High	High	Extreme	Extreme	Extreme
4 – Major	High	High	High	High	Extreme
3 - Moderate	Medium	Medium	Medium	Medium	High
2 – Minor	Low	Low	Low	Medium	Medium
1 – Insignificant	Low	Low	Low	Low	Medium
LIKELIHOOD	A Rare	B Unlikely	C Possible	D Likely	E Almost Certain

Overview of Risk Register Review as at December 2019

Number of new risks identified	8
Number of risks removed from register	2
Number of risks where overall rating has been reduced	0
Number of risks where overall rating has been increased	0

CONTENTS

ate Risk	Lead Officer/s		Risk Grade	
Lack of market testing for roll forward contracts	Chief Executive	\rightarrow	MEDIUM	6
Cyber Security	Director of Operations	\rightarrow	HIGH	9
Transformation Funding	Chief Executive	REMO	VED	-
PHA Staffing Issues including Public Health Consultant Staff Vacancies (revised March 2019)	Chief Executive (with all Directors)	REMC	VED	-
Failure to meet Statutory & Legal requirements in relation to Emergency Planning (EPRR)	Director of Public Health	→	HIGH	12
Connect – PHA Intranet	Director of Operations	\rightarrow	HIGH	14
PHA Web / social media platforms: public facing	Director of Operations		HIGH	16
Finance – COVID 19 (allocation)	Director of Finance		HIGH	18
Finance – COVID 19 (procurement)	Director of Finance		HIGH	19
Contact Tracing Service	Chief Executive/DPH		HIGH	20
Information Governance (COVID 19)	DPH		HIGH	22
Corporate Priorities	Chief Executive		HIGH	24
Ability of 3 rd Party Providers to deliver commissioned services	DPH and Director of Nursing/AHP		HIGH	25
Public Health Staffing Issues	Director of Public Health		HIGH	26
	Lack of market testing for roll forward contracts Cyber Security Transformation Funding PHA Staffing Issues including Public Health Consultant Staff Vacancies (revised March 2019) Failure to meet Statutory & Legal requirements in relation to Emergency Planning (EPRR) Connect – PHA Intranet PHA Web / social media platforms: public facing Finance – COVID 19 (allocation) Finance – COVID 19 (procurement) Contact Tracing Service Information Governance (COVID 19) Corporate Priorities Ability of 3 rd Party Providers to deliver commissioned services	Lack of market testing for roll forward contracts Cyber Security Director of Operations Transformation Funding PHA Staffing Issues including Public Health Consultant Staff Vacancies (revised March 2019) Failure to meet Statutory & Legal requirements in relation to Emergency Planning (EPRR) Connect – PHA Intranet Director of Operations PHA Web / social media platforms: public facing Finance – COVID 19 (allocation) Director of Finance Contact Tracing Service Chief Executive Chief Executive Chief Executive Chief Executive Chief Executive/DPH Information Governance (COVID 19) Chief Executive DPH and Director of Nursing/AHP	Lack of market testing for roll forward contracts Cyber Security Director of Operations → Transformation Funding Chief Executive REMO PHA Staffing Issues including Public Health Consultant Staff Vacancies (revised March 2019) Failure to meet Statutory & Legal requirements in relation to Emergency Planning (EPRR) Connect – PHA Intranet Director of Operations PHA Web / social media platforms: public facing Finance – COVID 19 (allocation) Director of Finance Contact Tracing Service Chief Executive Chief Executive/DPH Information Governance (COVID 19) Corporate Priorities Ability of 3 rd Party Providers to deliver commissioned services Director of Operations Chief Executive Director of Finance Chief Executive/DPH DPH Corporate Priorities Chief Executive DPH and Director of Nursing/AHP	Lack of market testing for roll forward contracts Chief Executive → MEDIUM Cyber Security Director of Operations → HIGH Transformation Funding Chief Executive REMOVED PHA Staffing Issues including Public Health Consultant Staff Vacancies (revised March 2019) Chief Executive (with all Directors) REMOVED Failure to meet Statutory & Legal requirements in relation to Emergency Planning (EPRR) Director of Public Health → HIGH Connect – PHA Intranet Director of Operations → HIGH PHA Web / social media platforms: public facing Director of Operations HIGH Finance – COVID 19 (allocation) Director of Finance HIGH Finance – COVID 19 (procurement) Director of Finance HIGH Contact Tracing Service Chief Executive/DPH HIGH Information Governance (COVID 19) DPH HIGH Corporate Priorities Chief Executive HIGH Ability of 3 rd Party Providers to deliver commissioned services DPH and Director of nursing/AHP HIGH

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Key:

Risk rating:

- increased from previous quarter decreased from previous quarter
- remained the same as previous quarter

RISK AREA/CONTEXT:

Delays in market testing health and social care contracts, as set out in the PHA Procurement Plan.

DESCRIPTION OF RISK:

The PHA has an extensive range of Health and Social Care contracts with non HSC providers (primarily health improvement contracts with voluntary and community sector). An approved PHA Procurement Plan is in place, and a range of large and smaller services have been procured. Some contracts are however rolled forward year on year, without the benefit of market testing. Full compliance with the PHA Procurement Plan has not been achieved due to limited capacity, skill constraints and the complexity of some contracts. It is therefore likely that the timescales in the current plan will not be met, with an additional challenge in respect of the requirement to reprocure the first contracts tendered by 2020. There is a risk that VFM is not being achieved in the current contracts and a potential reputational risk to the PHA.

DATE RISK ADDED:

September 2012 (Amalgamated with Corporate Risk 28, September 2013) Revised June 2018

LINK TO ASSURANCE FRAMEWORK: Operational Performance and Service Improvement Dimension

LINK TO ANNUAL BUSINESS PLAN 2019/20: Corporate Objective 5 Our Organisation Works Effectively

GRADING	LIKELIHOOD	IMPACT	RISK GRADE
	Possible	Moderate	MEDIUM

LEAD OFFICER: Mrs Olive Macleod, Interim Chief Executive

Existing Controls	Internal and External	Gaps in Controls and	Action Plan/Comments/	Review
	Assurances to the Board	Assurances	Timescale	Date
Procurement Plan has been	Progress reports on	Legacy contracts may	Action Plan to implement the	
developed and agreed by AMT	implementing the	not be providing value	recommendations of the Task &	Sept 2020
setting out the timescales for	Procurement Plan will be	for money	Finish Group Report will continue to	
achieiving the re-tendering of	provided to PHA Procurement		be taken forward during 2020/21.	
baseline contracts.	Board and annually to PHA	Limited capacity within	However, this will be impacted by	
	board	BSO PALS	staff priorities be re-focused on	
Revised processes and			addressing Covid 19.	
documentation-developed for	Leadership at AMT and	Limited capacity and	Specific actions that will be	
PHA in liaison with PALS to	Assistant Director level via	planning skills to	prioritised Approach for providing	
ensure tender process is applied	PHA Procurement board.	undertake essential pre-	Training for remaining staff in	
where required in line with		procurement planning,	Planning and Procurement	
Procurement regulations. Suite		business cases etc	processes to be reviewed in light of	
of documentation and guidance			Covid 19 working arrangements &	
for tendering in place.			delivered (September 2020)	

Report of the Planning and Procurement Task and Finish Group approved by AMT and presented to PHA Board workshop in June 2019.		
Training for staff in planning and procurement processes initiated in Feb 2020.		
1 senior planning posts recruited		

RISK AREA/CONTEXT: Cyber Security

DESCRIPTION OF RISK: Information security across the HSC is of critical importance to delivery of care, protection of information assets and many related business processes. If a cyber incident should occur, without effective security and controls, HSC information, systems and infrastructure (including those used by the PHA, as well as Trusts providing services for the PHA) may become unreliable, not accessible when required (temporarily or permanently), or compromised by unauthorised 3rd parties including criminals. This could result in significant business disruption.

DATE RISK ADDED:

June 2017

It could also lead to unauthorized access to any of our systems or information, theft of information or finances, breach of statutory obligations, substantial fines and significant reputational damage.

LINK TO ASSURANCE FRAMEWORK: Corporate Control Arrangements Dimension

LINK TO ANNUAL BUSINESS PLAN 2019/20: Corporate Objective 5 Our Organisation Works Effectively

GRADING	LIKELIHOOD	IMPACT	RISK GRADE
	Likely	Major	HIGH

LEAD OFFICER: Mr E McClean, Deputy Chief Executive (interim) and Director of Operations

Existing Controls	Internal and External	Gaps in Controls and	Action Plan/Comments/	Review
	Assurances to the Board	Assurances	Timescale	Date
Technical Infrastructure:	Internal Audit/BSO ITS self-	Insufficient corporate	BSO ITS provides PHA IT services.	June 2020
HSC security hardware (eg	assessment against 10 Steps	recognition and	PHA will continue to work with BSO	
firewalls);	towards NCSC;	ownership of cyber	ITS, HSCB e-health and through the	
HSC security software (threat)	Technical risks assessments	security threat as a	HSC SIRO forum	
detection, antivirus, email &	and penetration tests;	service delivery risk	Regional Cyber Security	
web filtering);	HSC SIRO Forum for shared	Full extent of gaps are	Programme Board has developed a	
 Server/client patching; 	learning and collaborative	not understood at this	draft incident management plan and	
3 rd party Secure Remote	action planning and delivery;	point – a gap analysis	handbook, with the intention of	
Access;	Reports to GAC/PHA board	regionally and by HSC	undertaking a desk top test across	
Data & system backups	on reported incidents as	organisations is required	the region (late 2019/20 or early	
Regional funding provided &	appropriate.	to capture a considered	20/21)	
Sophos Intercept X &		extent of vulnerabilities		
a spiles interesperation		Insufficient User		

Sophos Sandstorm software	Awareness of impact of	
& PKI hardware purchased &	personal behaviours in	
being installed.	relation to cyber threat	
	Toldwin to dybor timeat	
Policy, Process:		
Regional & local		
ICT/information security		
policies;		
Data protection policy;		
Change Control Processes;		
User Account Management		
processes;		
Disaster Recovery Plans;		
Emergency Planning &		
Service/Business Continuity		
Plans;		
Corporate Risk Management		
Framework, processes &		
monitoring;		
Regional & local incident		
management & reporting		
policies & procedures;		
policies & procedures,		
User Behaviours – influenced		
through:		
1 7 1		
Mandatory Training;		
HR Disciplinary Policy;		
Contract of employment;		
3 rd party contracts/data		
access agreements		
PHA BCP tested and updated		
February 2018 with a focus on		
cyber security		

PHA member of the Regional		
HSC Cyber Security Business		
Continuity Group		
Continuity Group		
BSO cyber security project		
manager co-ordinating regional		
cyber security work.		
Cyber security work.		
Regional cyber security		
programme board (BSO		
representing PHA) taking		
forward actions arising from		
DXC report and		
recommendations Ongoing work		
being taken forward and		
overseen by the Regional Cyber		
Security Programme Board.		
Internal Audit of 'user behaviour'		
relating to cyber security		
(conducted January 2020)		
1)		
provided satisfactory assurance.		

RISK AREA/CONTEXT: Failure to meet statutory & legal requirements in relation to Emergency Planning (EPRR)

DESCRIPTION OF RISK:

Disruption, loss of reputation, inefficient response, failure to meet statutory and legal requirements for Emergency Preparedness, Resilience and Response (EPRR)

DATE RISK ADDED: April 2019

The PHA Health Protection Team has a statutory responsibility for emergency response. Inadequate mechanisms to financially compensate staff (across all pay bands) that are not on a service rota, has meant that staff are reluctant to participate in training or emergency response. This directly contributes to the following areas of risk for organisational resilience and emergency response;

Inability to fully operationalise the Joint Response Emergency Plan.

Absence of identified group of staff for activation of the Emergency Operation Centre Plan and vulnerability to organisational resilience for a sustained emergency response, management of an outbreak and pandemic response.

LINK TO ASSURANCE FRAMEWORK: Corporate Control Arrangements Dimension

LINK TO ANNUAL BUSINESS PLAN 2019/20: Potentially all corporate objectives; particularly corporate objectives 4 (working together to ensure high quality services) and 5 (our organisation works effectively).

GRADING	LIKELIHOOD	IMPACT	RISK GRADE
	Likely	Major	HIGH

LEAD OFFICER: Professor Hugo Van Woerden, Director of Public Health

Existing Controls	Internal and External Assurances to the Board	Gaps in Controls and Assurances	Action Plan/Comments/ Timescale	Review Date
 Number of senior staff trained in emergency response (PHA,HSCB, BSO). The proposal for staff 	Reports to AMT.	 Availability for out of hours response. Sustaining an out of hours response. Compensation under 	Following learning from COVID-19 a further review of service business continuity plans and business impact analysis is required to	Sept 2020

payment has been agreed by HR, SMT/AMT and consultation completed with Trade Union colleagues.	AFC T&Cs for extended working hours.	support the redeployment and training of staff to support an emergency response and maintaining the function of the EOC (in hours and out of hours). (March 2021) Continue to work with HR to seek clarification and solution regarding payment and compensation for senior staff who are not on an on-call rota and who are involved in emergency response (Band 7 and above). (review Sept 2020)

Corporate Risk 47 **RISK AREA/CONTEXT:** Connect - PHA Intranet **DESCRIPTION OF RISK:** DATE RISK ADDED: June 2019 The PHA has been working with BSO ITS to redevelop the Connect Intranet site as a WordPress site that can be hosted and supported by BSO. Development has been slow due to a combination of factors including competing priorities within the ITS web development programme and ITS staff capacity. The site currently sits on an old unsupported version of Drupal and this means that the site is now operating at an increased risk of critical failure and non recovery which would negatively impact the operational efficiency of the PHA. Moving the site onto a more recent version of Drupal would be a significant workload commitment and largely nugatory given the pending transition to Wordpress for the ITS project. Furthermore, the site is hosted on Linode, a third party provider. Linode brought the site down in June which impacted on business continuity for 24 hours; while the site was restored there is potential for this to reoccur. LINK TO ASSURANCE FRAMEWORK: Corporate Control Arrangements Dimension LINK TO ANNUAL BUSINESS PLAN 2019/20: Corporate Objective 5 Our Organisation Works Effectively GRADING LIKELIHOOD IMPACT **RISK GRADE** Possible Major HIGH **LEAD OFFICER:** Mr E McClean, Deputy Chief Executive / Director of Operations **Existing Controls** Gaps in Controls and **Action Plan/Comments/** Internal and External Review Assurances to the Board **Assurances Timescale** Date Work is ongoing with BSO ITS to June 2020 Work is progressing-with BSO Site maintained/managed • It sits on an ITS on the development of a reach a stage where it can be under BT48 support contract unsupported version launched with an acceptable site new intranet on the of Drupal; the Weekly backups of the Wordpress platform. A new platform and map. Content migration completed. current site are also server has been employed by application are Transfer pending final migration conducted off site. BSO ITS which has permitted review. insecure: Inclusion in Business additional functionality and Launch delayed due to COVID 19 It is hosted on Continuity planning capacity. Regular response, existing intranent being Linode, a third party communication with BSO ITS used and updated. site which poses an is ongoing. New intranet to be rolled out when additional risk: resources allow. • BT48 support is

limited to low level maintenance

June 2020



APPENDIX

RISKS ADDED TO THE CORPORATE RISK REGISTER AS AT 31 May 2020

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RISK AREA/CONTEXT: PHA Public Website

DESCRIPTION OF RISK:

The existing PHA public facing website has very restricted functional utility. This has proven to be a significant liability in the response to COVID-19 and has restricted significantly what can be hosted. It is essential for the PHA's messaging to have excellent contemporary functionality, be able to host dynamic content, digital presentations and plug-in directly other content/functionality from other PHA websites including new COVID 19 platforms. As the current website is at the end of its life there is increased and material risk in respect of support arrangements. Risk that key messages are not communicated and reputational risk for the PHA.

DATE RISK ADDED:

March 2020

LINK TO ASSURANCE FRAMEWORK: Corporate Control Arrangements Dimension

LINK TO ANNUAL BUSINESS PLAN 2019/20: Corporate Objective 5 Our Organisation Works Effectively

GRADING	LIKELIHOOD	IMPACT	RISK GRADE
	Possible	Major	HIGH

LEAD OFFICER:, Mr E McClean, Deputy Chief Executive / Director of Operations

Existing Controls	Internal and External	Gaps in Controls and	Action Plan/Comments/	Review
	Assurances to the Board	Assurances	Timescale	Date
Hosting, maintenance and updating services have been procured via an external provider (contract is due for procurement in year)	Regular contact ongoing between Communications team and maintenance provider	Level of functionality remains limited within the existing website and constrains our ability to more effectively communicate with key audiences. Latest research shows that shortcomings can	 Reprovision of PHA website. New web spec/business case to be developed and submitted Digital Health team for consideration/approval (by July 2020); Programme of maintenance and updating planned (ongoing); Procure re-development contract and take forward work to deliver new website on an alternative 	September 2020

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	only be addressed by rebuilding the site No contingency arrangements in place	hosting platform which is supported via BSO/NICS in house (needs timescale) Recruite vacant web developer post (review Sept 2020)	
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Corporate Risk 49 RISK AREA/CONTEXT: Finance – COVID 19 (allocation) DATE RISK ADDED: **DESCRIPTION OF RISK**: The requirement to respond rapidly to the developing coronavirus epidemic has resulted in expenditure being authorised and incurred before financial allocations May 2020 are secured. There is a risk to financial stability if financial allocations subsequently made are not sufficient to cover expenditure commitments. LINK TO ASSURANCE FRAMEWORK: Corporate Control Arrangements Dimension LINK TO ANNUAL BUSINESS PLAN 2019/20: Corporate Objective 5 Our Organisation Works Effectively **LIKELIHOOD RISK GRADE GRADING IMPACT** Likely HIGH major **LEAD OFFICER:**, Director of Finance Internal and External **Existing Controls** Gaps in Controls and Action Plan/Comments/ Review Assurances to the Board **Assurances Timescale** Date • Finance proformas required Monthly monitoring of spend Approvals of COVID-19 No allocation letters for COVID related templated noted at GOLD, separately identified. End of in advance of expenditure – process to where financial expenditure being June 2020 feed through HSC Silver to Level of financial risk committed. consequences are noted. Gold for approvals. highlighted to DOH and PHA board on regular basis. Monthly monitoring returns • DOH finance also sighted on to DOH highlighting spend to date and forecast finance implications of COVID-19 related service COVID 19 related spend is highlighted separately. proposals. • Business case processes for • Finance reports will highlight extent of financial major expenditure.

risk to PHA SMT/Board on

regular basis.

Corporate Risk 50 RISK AREA/CONTEXT: Finance - COVID 19 (procurement) DATE RISK ADDED: **DESCRIPTION OF RISK**: The requirement to respond rapidly to the developing coronavirus epidemic results in expenditure being incurred without due regard to the principles of Managing Public Money NI, leading to poor value for money, irregular expenditure and the potential for legal challenge. LINK TO ASSURANCE FRAMEWORK: Corporate Control Arrangements Dimension LINK TO ANNUAL BUSINESS PLAN 2019/20: Corporate Objective 5 Our Organisation Works Effectively **RISK GRADE GRADING LIKELIHOOD IMPACT** Likely Major High **LEAD OFFICER:** Director of Finance **Existing Controls** Internal and External Gaps in Controls and Action Plan/Comments/ Review Assurances to the Board Assurances **Timescale** Date All Direct Award contracts List of DACs reviewed Normal procurement Review DACs awarded during (DACs)are reviewed by regularly by GAC. processes and COVID-19 timescales to COPE. timescales have determine extent of commitment Normal DAC approvals been temporarily and if it can be replaced with full Automated SODA process for have continued. suspended in a procurement. number of cases. Monitor expenditure for unusual approval of order/invoices variances that cannot be explained. DACs require DOF/AO approval.

RISK AREA/CONTEXT: Contact Tracing Service

DESCRIPTION OF RISK: The PHA has been tasked with the rapid establishment of a COVID 19 Contact Tracing Service. Failure to fully implement an appropriate Contact Tracing service, with the capacity to scale up and down, within the necessary timescale will result in an inability to control and prevent community transmission of COVID 19, leading to increased deaths and a surge in activity that the HSC would not have the capacity to cope with. PHA would also face significant reputational damage.

DATE RISK ADDED: May 2020

LINK TO ASSURANCE FRAMEWORK: Operational Performance and Service Improvement Dimension

LINK TO ANNUAL BUSINESS PLAN 2019/20: All Health and Wellbeing Services should be Safe and High Quality (4)

GRADING	LIKELIHOOD	IMPACT	RISK GRADE
	Possible	Major	High

LEAD OFFICER: CX (or DPH?)

Existing Controls	Internal and External	Gaps in Controls and	Action Plan/Comments/	Review
	Assurances to the Board	Assurances	Timescale	Date
 Relevant senior PHA staff represented on the Contact Tracing Steering Group (chaired by Dr L Mitchell and Mr A Findlay on behalf of the DoH); Programme lead overseeing all elements; Interim Contact Tracing Centre Manager appointed. PHA staff represented on the Digital TTIS Steering Group 	 Reports to Departmental Oversight Group (chaired by CMO, the SRO for Contact Tracing) through Chief Executive and CT Steering Group Chair; Reports to PHA Board through the Chief Executive 	 Complexity of digital and manual systems to be developed in a very tight timescale; Uncertainities & unknowns regarding COVID 19 	 BC for funding for staffing, accommodation & G&S submitted & waiting approval of funding (expected by 19/6/20); Accommodation identified; BC approved (see re funding above), & preparatory work underway (expected complete by 22/6/20); Recruitment underway (review 30/6/20); Work underway with Digital Health to ensure CRM & analytics for tier 1 & 2 contact tracing, digital self trace system & proximity app (review 30 June 2020); 	30 June 2020

Work underway to establish tier 3 call centre provided by NIDirect, through DoH MOU (29 June 2020); Extensive communications programme (including engagement with MLAs, and key sectors including human rights, equality, older people & children's commissioners) (review 30 June 2020)	
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RISK AREA/CONTEXT: Information Governance

DESCRIPTION OF RISK: As a result of the COVID 19 PHA has been required to collect and hold significant new personal identifyable data. There has also been a requirement to put in place new arrangements for data sharing with other bodies. There is a risk that given the scale, especially of the testing and contact tracing services, the need to establish new digital and manual systems and services rapidly, and the complexity of interfaces with other bodies (including the DoH and DHSC and NHSX), that all GDPR principles are not fully complied with, with the potential for a data breach, and/or reputational or financial consequences for the PHA as a result.

DATE RISK ADDED: May 2020

LINK TO ASSURANCE FRAMEWORK: Corporate Control Arrangements Dimension

LINK TO ANNUAL BUSINESS PLAN 2019/20: Corporate Objective 5 Our Organisation Works Effectively

GRADING	LIKELIHOOD	IMPACT	RISK GRADE
	possible	major	High

LEAD OFFICER: Director of Public Health

Existing Controls	Sting Controls Internal and External Gaps i Assurances to the Board Assura		Action Plan/Comments/ Timescale	Review Date	
 PHA Data Protection Policy; PHA Data Protection Impact Assessment Policy and Guidelines; Established processes in PHA, including Health Protection; Existing training programme for all PHA staff and IAOs Engagement with the PHA DPO and information governance team; Information Governance Workstream established 	 DPO attends Contact Tracing Steering Group & chairs the IG Workstream; PHA SIRO and PDG attend & report to AMT and PHA Board 	Speed of implementation resulting in less time to consider & implement IG measures; Complexity of data flows & lack of clarity about ownership;	 DPIA for testing programme being developed to be complete by 22/6/20; DPIA for manual contact tracing & digital self trace being developed (by end June 2020); PNs for contact tracing to be published (June 2020); MOU between Health Protection, HSCTs, HSCB and BSO reviewed (by 22 June 2020); All staff for the contact centre (tier 1 & 2, permanent and bank) to complete IG training (on-going as recruited); 	30 June 2020	

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under the CT Steering Group;		•	
 Close working & regular 			
liaison between PHA DPO			
and DoH DPO;			
 Engagement with ICO 			
 DPIA for contact tracing pilot completed; 			
PN for testing on PHA			
website;			
 PHA represented at 4 			
Nations IG meetings			

Corporate Risk 53					
RISK AREA/CONTEXT: Co	rporate Priorities				
DESCRIPTION OF RISK : There is a risk, that due to COVID 19, the PHA may not be able to deliver on its key objectives. Firstly as a result of the need to refocus staff to prioritise work in response to the COVID 19 pandemic, including planning for and putting measures in place to help prevent/minimise the impact of a second wave. As a result it has not been possible to take forward all other areas of PHA business. There is therefore a risk that the PHA will not be able to deliver on its key objectives					DED:
LINK TO ASSURANCE FRA	MEWORK: Corporate Cor	ntrol Arrangements Di	mension		
LINK TO ANNUAL BUSINES	SS PLAN 2019/20: All object	ctives			
GRADING	LIKELIHOOD	IMPACT	RISK GRADE		
	likely	major		HIGH	
LEAD OFFICER: Chief Exe	cutive				
Existing Controls	Internal and External Assurances to the Board	Gaps in Controls and Assurances	Action Plan/Comme Timescale	ents/	Review Date
 Corporate summary of all Directorate COVID 19 and 'rebuilding' priorities prepared. Discussion with CMO at SRM; Director meetings with Chief Executive; Director meetings with their 	Discussion at AMT Reports from AMT/Chief Executive to PHA Board	Limited capacity to take forward some core work.	 Development of r 2020/21 identifyir remaining 9 mont AMT/Board works priorites for year a going); Development of r Corporate Plan (N 	ng priorities for ths (July 2020) shops to agree ahead (on- new 5 year	Sept 2020

senior teams

Corporate Risk 54 RISK AREA/CONTEXT: Ability of 3rd Party Providers to Deliver Commissioned Services DATE RISK ADDED: **DESCRIPTION OF RISK**: In order to deliver on its corporate objectives, the PHA commissions many 3rd party May 2020 providers to deliver a wide range of services. As well as Trusts and local government, many services are provided by a large number of voluntary, community and private organisations. As a result of COVID 19, including the economic consequences, some of these organisations may no longer be able to deliver services (in whole or in part), with the risk that PHA may not be able to deliver the necessary services to achieve its corporate objectives. LINK TO ASSURANCE FRAMEWORK: Corporate Control Arrangements Dimension LINK TO ANNUAL BUSINESS PLAN 2019/20: All objectives GRADING **LIKELIHOOD IMPACT RISK GRADE** possible major High **LEAD OFFICER: Director of Public Health and Director of Nursing/AHP Existing Controls** Internal and External Gaps in Controls and **Action Plan/Comments/** Review **Assurances** Assurances to the Board Timescale Date · Continuation of existing Reports to AMT and PHA Services may not be Contract managers to review all Sept 2020 performance management board delivered, resulting in contracts arrangements; greater inequalities; · On-going dialogue with Funding may be providers allocated with no/less service delivered

RISK AREA/CONTEXT: Public Health Staffing Issues

DESCRIPTION OF RISK:

The Public Health Directorate has a number of vacancies in key areas as well as a number of posts filled on a temporary basis. In the Health Improvement Division, 46% of posts are filled on a temporary basis. The vacancies, and the increasing demands, particularly due to the impact of COVID-19, work to rebuild services and the transformation agenda mean that the existing staff resources are stretched significantly in a number of areas. The number of temporary staff adds further instability. This is not a sustainable position, with constrained capacity in a number of key areas and functions, potential delays taking forward new initiatives, the potential for significant issues to be missed, reduced organisational resilience at times of pressure or emergency limited ability to respond adequately to and deliver on statutory responsibilities and the personal strain on individuals, with the potential for increased sickness absenteeism and further loss of staff.

DATE RISK ADDED: June 2020

LINK TO ASSURANCE FRAMEWORK: Corporate Control Arrangements Dimension

LINK TO ANNUAL BUSINESS PLAN 2019/20: Potentially all corporate objectives; particularly corporate objectives 4 (working together to ensure high quality services) and 5 (our organisation works effectively).

GRADING	LIKELIHOOD	IMPACT	RISK GRADE
	Likely	Major	HIGH

LEAD OFFICER: Director of Public Health

Existing Controls		Internal and External		aps in Controls and		ction Plan/Comments/	Review
		Assurances to the Board	A	ssurances	Ti	mescale	Date
•	Contact has been made with individuals working elsewhere to see if they would consider applying for any of the public health consultant posts. Funding was made available for 2 additional public health trainee posts in 2019.	 Reports to AMT. Updates to GAC via Corporate Risk register Briefing provided to PHA Board. 	•	Number of temporary posts. Skill mix issues Delays in HR/RSSS recruitment process Length of time for JD evaluations to be returned to recruiter, & lack of	•	Public Health Directorate continue to look at other options with HR to recruit public health specialists (September 2020) Business cases are being developed for additional resource to support appointment of required additional capacity (September 2020)	September 2020

	·		
Action Plan developed (in respect of all PHA staffing), approved by AMT, and agreed with DoH Arrangements for nonmedical PH trainee (from Feb 2020) New permanent & locum consultants commenced between December 2019 and February 2020. Development and implementation of 'Retire & Return' policy – 2/3 Consultants Additional temporary posts offered to retired Public Health Consultants (7 posts) A number of staff external to PHA have been engaged to support work associated with COVID-19 contact tracing, project delivery etc Some PHA have been redeployed to support COVID-19 where they had particular skills relevant to the response to the pandemic (eg from nursing,	communication, leading to further delays in recruitment.	 Ongoing prioritisation of work and reflecting capacity in the development of PHA Annual Business Plan (September 2020) Continue to review and take forward actions agreed with DoH (on-going) Work with HR to progress any recruitment delayed as a result of COVID-19 (September 2020). 	
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APPENDIX

RISKS REMOVED FROM CORPORATE RISK REGISTER AS AT 31 March 2020

RISK AREA/CONTEXT: Transformation Funding – REMOVE RISK. Transformation Funding has ended. Any issues regarding funding to be recorded under normal finance procedures and under relevant Directorate Risk Register as appropriate.

DESCRIPTION OF RISK: Insufficient budget to cover Transformation projects that have been shown to have a positive impact on a recurring basis. This includes the staffing and work programme of HSCQI.

DATE RISK ADDED:

June 2018

LINK TO ASSURANCE FRAMEWORK: Operational Performance and Service Improvement Dimension

LINK TO ANNUAL BUSINESS PLAN 2019/20: Potentially all Corporate objectives, particularly Corporate Objective 5 Our Organisation Works Effectively

GRADING	LIKELIHOOD	IMPACT	RISK GRADE
	Likely	Major	HIGH

LEAD OFFICER: Mrs Olive Macleod, Interim Chief Executive

	new 2020.) DoH has asked that these be continued where there is evidence to show they are having a positive impact. Subsequently DoH advised that no additional funding has been allocated to PHA in 2020/21 for Transformation programmes. PHA will review its overall budget position (Programme & Management & Admin) for 2020/21 and identify in its Investment Plan what Transformation programmes can be supported with the funding available (June 2020) through service redesign or securing funding through mainstream HSC service commissioning. Associated posts within the PHA will have to be reviewed by June 2020
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RISK AREA/CONTEXT: PHA Staffing Issues – Remove from Risk Register, as many of the issues have been resolved or needs changed. Each Director to review their own staffing position, and include any remaining risk, on their Directorate Risk Register. Where appropriate Directorate risks can be escalated to the Corporate Risk Register.

DESCRIPTION OF RISK:

The PHA had a number of vacancies in key areas as well as posts filled on a temporary basis across all Directorates and at all levels of the organisation. This related to Public Health Consultants in paryiocular as well as other key posts in Nursing/AHP and Operations.

The vacancies, and the increasing demands, particulary due to the impact of COVID-19, mean that the existing staff resources are stretched significantly in a number of areas and the number of temporary staff adds further instability. This is not a sustainable position, with constrained capacity in a number of key areas and functions, potential delays taking forward new initiatives, the potential for significant issues to be missed, reduced organisational resilience at times of pressure or emergency limited ability to respond adequately to and deliver on statutory responsibilities and the personal strain on individuals, with the potential for increased sickness absenteeism and further loss of staff.

DATE RISK ADDED:

October 2018

Revised March 2019

LINK TO ASSURANCE FRAMEWORK: Corporate Control Arrangements Dimension

LINK TO ANNUAL BUSINESS PLAN 2019/20: Potentially all corporate objectives; particularly corporate objectives 4 (working together to ensure high quality services) and 5 (our organisation works effectively).

GRADING	LIKELIHOOD	IMPACT	RISK GRADE
	Likely	Major	HIGH

LEAD OFFICER: Chief Executive (with all Directors)

Existing Controls	Internal and External	Gaps in Controls and	Action Plan/Comments/	Review
	Assurances to the Board	Assurances	Timescale	Date
Contact has been made with individuals working elsewhere to see if they would consider applying for any of the public health	 Reports to AMT. PHA/DoH working group established. Updates to GAC via Corporare Risk register Briefing provided to PHA 	 Number of temporary posts. Skill mix issues Delays in HR/RSSS recruitment process Length of time for JD 	Public Health Directorate continue to look at other options with HR to recruit public health specialists as we cannot fill the vacant Consultant posts by 31 December 2019	March 2020)

consultant posts.	Board.	evaluations to be	Business cases -are being
 Funding has been made 		returned to recruiter,	developed to use programme
available for 2 additional		& lack of	funds to support appointment of
public health trainee posts in		communication,	additional non-consultant
2019.		leading to further	screening (to AMT by March
 Action Plan developed, 		delays in	2020) and Health Protection staff
approved by AMT, and		recruitment.	(with DoH awaiting approval –
approved by			March 2020) Ongoing
DoHArrangments for non-			priorisation of work and reflecting
medical PH trainee (from Feb			capacity in the development of
2020)			PHA Annual Business Plan
PH Consultant interviews			(September 2020)
(Nov 2019) – successful,			 Planned recruitment of additional
new permanent & locum			planning staff to address skill mix
consultants commenced			issues to support all PHA
between December 2019			directorates(Jan 2020);
and February 2020.			 Continue to review and take
 One Senior Planning 			forward actions agreed with DoH
Manager appointed.			(review September 2020 after
 Development and 			next meeting)
implementation of 'Retire &			 External support commissioned
Return' policy – 2/3			via Leadership Centre to take
Consultants			forward PHA HR & OD Strategy
 Additional temporary posts 			(March Sept 2020)
offered to retired Public			 Permanent and locum
Health Consultants (7 posts)			consultants have been
 A number of staff from 			appointed, one started with HP
outside the PHA have been			in December 2019 and two
engaged to support work			others are due to start in
associated with COVID-19			February/March 2020.
contact tracing, project			Due to the ongoing COVID-19
delivery etc			response further recruitment has
 Some PHA staff have been 			been delayed due to the pandemic.
redployed to support COVID-			The HP service is looking to appoint
19 where they had particular			futher staff in the future (review
akilla ralayant to the			September 2020)

skills relevant to the

September 2020).

response to the pandemic (eg from nursing, project amangement, data analysis, communications etc)		