

# Policy and Sustainability Committee

10.00am, Tuesday, 30 November 2021

## Enterprise Risk Management Policy

Item number

Executive/routine

Executive

Wards

Council Commitments

### 1. Recommendations

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It is recommended that the Committee:

- 1.1 Reviews and approves the Council's updated Enterprise Risk Management Policy as set out in Appendix 1 to this report; and,
- 1.2 Refers the report to the Governance, Risk and Best Value (GRBV) Committee for information.

**Stephen S. Moir**

Executive Director of Corporate Services

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## Enterprise Risk Management Policy

### 2. Executive Summary

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- 2.1 The purpose of this paper is to present the Council's refreshed Enterprise Risk Management Policy (the Policy) to the Committee for review and approval.
- 2.2 This Policy supersedes the existing policy dated October 2020.
- 2.3 The Policy describes the Council's overarching risk management approach and is supported by a more granular operational risk management framework that describes how the policy will be applied by all Council directorates and divisions.
- 2.4 The operational risk management framework has also been refreshed, with the pilot currently underway and scheduled to complete in December 2021. Pilot outcomes will be shared with the Corporate Leadership Team (CLT) in January 2022, together with a recommended Implementation approach.
- 2.5 Any further policy changes required to reflect the refreshed framework will be included in the next policy review scheduled for October 2022.

### 3. Background

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- 3.1 Risk management in public sector organisations is not a statutory requirement and is not supported by any specific legislation. It is, however, central to good governance and organisational culture, and is a fundamental part of effective business management.
- 3.2 As risk management is not a statutory or legislative requirement, it is the Council's responsibility to determine its risk appetite; set the tone of its risk culture; and design and implement its own risk Enterprise Risk Management Policy (ERMP) and supporting framework.
- 3.3 The Chartered Institute of Public Finance and Accountancy (CIPFA) also notes that the discipline of risk management promotes innovation in support of strategic objectives and service delivery; opening the door to the possibility of taking risks to achieve positive outcomes.
- 3.4 Establishing an ERMP should also support identification and realisation of the improvements and benefits associated with both planned and unexpected

opportunities, whilst protecting the Council's employees; assets; and reputation (where possible) from their potential negative impacts.

- 3.5 Consequently, good risk management should be an embedded component of both decision making and ongoing service delivery across the Council; should be viewed positively; and should not be performed as a separate standalone or retrospective activity.
- 3.6 The Council has adopted the Institute of Internal Auditors Three Lines model to support the operation of its risk management framework. Within this framework:
  - 3.6.1 First line divisions and directorates are responsible for identifying; assessing; recording; addressing; and escalating risks (where required) associated with decision making and ongoing service delivery.
  - 3.6.2 First line teams are supported by the second line Corporate Risk Management team who are responsible for maintaining the Policy; the supporting operational risk management framework; providing ongoing oversight and challenge in a 'constructive critical friend' capacity; driving a positive risk culture through delivery of ongoing training and engagement; and providing ongoing assurance that the framework is being consistently applied.
  - 3.6.3 Independent assurance on the design and effective application of risk management policies and frameworks across the Council is provided by Internal Audit (IA).
- 3.7 The current Policy was last reviewed and confirmed as remaining fit for purpose by the Committee in October 2020.

## **4. Main report**

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- 4.1 The objective of the ERMP is to support achievement of the Council's priorities by establishing a structured and proportionate organisational risk management approach that:
  - 4.1.1 supports all Council areas in making and recording effective risk based strategic and operational decisions;
  - 4.1.2 ensures that all known current and future risks associated with ongoing service delivery are consistently and effectively identified; recorded; assessed; and appropriately mitigated and managed in line with the Council's risk appetite; and
  - 4.1.3 supports identification and realisation of the potential improvements associated with both planned and unexpected opportunities, whilst protecting the Council's employees; assets; and reputation (where possible) from their potential negative risk impacts.
- 4.2 The Policy sets out how risk management should be considered when making both strategic and operational decisions and delivering services; the Council's risk culture; the requirements for effective application of the operational risk

management framework across Council services; risk management structures and responsibilities across the Three Lines (including those of senior management); and ongoing risk management assurance arrangements.

- 4.3 The Policy also includes the requirement to consider project delivery risks, and any risks associated with partnership or contractual arrangements supporting delivery of Council priorities and service delivery that could potentially affect the Council.
- 4.4 When refreshing the Policy, good practice has been considered and incorporated (where relevant) from a number of sources, including the risk management guidance included in the Scottish Government's Public Finance Manual; CIPFA; the International Organisation for Standardisation's ISO31000 Risk Management Guidelines; the Institute of Risk Management; and other public bodies.
- 4.5 The policy will be implemented in line with the Council's agreed risk appetite which sets out the amount of risk that the Council has agreed that it is prepared to accept.

## **5. Next Steps**

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- 5.1 Once approved by the Committee, the Policy will be shared and communicated across the Council, with the refreshed version published on the policy register maintained on the Council's website.

## **6. Financial impact**

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- 6.1 There are no direct financial implications associated with the Policy, although there may be costs associated with implementing controls to mitigate risks and/or failing to mitigate risks.

## **7. Stakeholder/Community Impact**

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- 7.1 Consistent and effective application of the Policy will help to ensure that Council's employees; assets; and reputation are protected (where possible) from the negative risk impacts associated with planned and unplanned events, whilst identifying opportunities for improvement

## **8. Background reading/external references**

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- 8.1 [ISO31000 Risk Management Guidelines](#)
- 8.2 [Institute of Risk Management](#)
- 8.3 [Management of Risk](#)
- 8.4 [CIPFA](#)
- 8.5 [Scottish Government Finance Manual](#)

# 9. Appendices

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9.1 Appendix 1 - Enterprise Risk Management Policy

# Enterprise Risk Management Policy

Implementation date: 30 November 2021

## Control schedule

Version control

<b>Approved by</b>	Policy and Sustainability Committee
<b>Approval Date</b>	30 November 2021
<b>Senior Responsible Officer</b>	Stephen Moir, Executive Director of Corporate Services,
<b>Author</b>	Lesley Newdall, Head of Audit and Risk
<b>Scheduled for review</b>	October 2022

Version control

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Comment</b>
<b>0.3</b>	<b>6 October 2020</b>	Lesley Newdall, Senior Audit and Risk Manager	
<b>0.4</b>	<b>30 November 2021</b>	Lesley Newdall, Head of Audit and Risk	

Previous committee decisions affecting this policy

<b>Date</b>	<b>Committee</b>	<b>Link to report</b>	<b>Link to minute</b>
<b>6 October 2020</b>	<b>Policy and Sustainability Committee</b>	<a href="#">Report</a>	<a href="#">Meeting Minute</a>

# Enterprise Risk Management Policy

## Policy statement

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- 1.1 The Council's priorities of ending poverty and preventing adverse outcomes such as homelessness and unemployment; becoming a sustainable and net zero city; and making sure wellbeing and equalities are enhanced for all are outlined in the current Business Plan, *Our Future Council, Our Future City*. In addition to these priorities, the Business Plan confirms that the Council will continue the fight against Covid-19, and manage the ongoing budget challenges, whilst changing the way that these priorities and services will be delivered (Our Future Council).
- 1.2 The objective of this Enterprise Risk Management Policy (the Policy) is to support achievement of the Council's priorities by establishing a structured and proportionate risk management approach which seeks to ensure that the risks associated with strategic and operational decisions are consistently and explicitly considered and recorded, and that all known current and future risks associated with delivering priorities and services are consistently and effectively identified; recorded; assessed; and appropriately mitigated and managed in line with the Council's agreed risk appetite.
- 1.3 The Policy also aims to support identification and realisation of the potential improvements associated with both planned and unexpected opportunities, whilst protecting the Council's employees; assets; and reputation (where possible and appropriate) from their potential negative risk impacts.
- 1.4 The Council delivers a wide range of services, under a variety of legislation, for the benefit of the people of Edinburgh. The operating environment is complex and changeable, and the Council's performance is regularly and closely scrutinised.
- 1.5 Risk management is a fundamental part of effective business management, and should be an embedded component of both decision making and ongoing service delivery. It should not be considered or performed as a separate; standalone; or retrospective activity.
- 1.6 The Policy is supported by an established operational risk management framework (the Framework) that describes the detailed operational risk management processes to be applied across the Council.

## Scope

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- 2.1 'Enterprise Risk Management' describes the consideration and management of risk across all Council decisions and activities, and this Policy describes the Council's enterprise risk management approach. Consequently, Directorate; Divisional; and Service risk management arrangements described in other Council policies should be aligned with this Policy to the fullest extent possible.
- 2.2 This Policy applies to all Council employees.
- 2.3 When working collaboratively in partnership with Arms' Length External Organisations (ALEOs); or under contracts with third parties, appropriate risk management arrangements must be agreed, established, and understood, with any potential risks associated with these arrangements that could impact the Council recorded in relevant risk registers.
- 2.4 The Council's arms-length external organisations (ALEOs) are responsible for ongoing management of risk within their organisations and are expected to have established and operate their own appropriate risk management arrangements.
- 2.5 This Policy does not replace any statutory risk management or reporting requirements.

## Definitions

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In this document the following terms and definitions are used:

- 3.1 **Action** - a planned measure that is intended to reduce the [Likelihood](#) and/or [Impact](#) of a [Risk](#). Where an action is implemented before a [Risk](#) has become an [Issue](#) it becomes a [Control](#). An action aims to reduce the [Current Risk](#) towards the [Target Risk](#).
- 3.2 **Action Owner** – a single role or individual responsible for the implementation of an [Action](#). This may be a different person to the [Risk Owner](#).
- 3.3 **Assurance** - the processes applied to assess the design and effectiveness of [Controls](#). Assurance can be performed by any of the [Three Lines](#).
- 3.4 **Cause** – an unplanned situation or event that causes a potential [Risk](#) to occur.
- 3.5 **Control** - a measure that is designed to reduce [Risk](#). A control will be either *directive* (a '[Do Control](#)'); *preventative* (a '[Stop Control](#)'); or *detective* (a '[Spot Control](#)'). Controls may not always operate as designed.
- 3.6 **Control Effectiveness** – an assessment of how well controls have been designed and are operating to manage [Risk](#). The design and operating effectiveness of [Controls](#) is assessed through [Assurance](#).



- 3.7 **Current Risk**- the level of **Risk** at the present time, taking into account the design and effectiveness of **Controls**. **Current Risk** is assessed and scored based on **Original Risk** and **Control Effectiveness**. If the **Controls** are effective, then the Current Risk will be less than the **Original Risk**. **Current Risk** is also called **Residual Risk**.
- 3.8 **Do Controls** – directive **Controls** that direct / tell you what you should do such as legislation; policies; guidance; or procedures.
- 3.9 **Enterprise Risk Management (ERM)** – the risk management process that should be applied across the Council’s decisions and activities. It aims to ensure that the principles of **Risk Management** are consistently and effectively applied.
- 3.10 **Horizon scanning** – ongoing review of the internal operating environment and external economic; regulatory; and legislative environments to identify any potentially new emerging **Opportunities**; **Threats**; and their associated **Risks** that could potentially **Impact** the organisation.
- 3.11 **Impact** - The result of a particular **Risk** or **Risk(s)**, occurring individually or simultaneously, on delivery of **Priorities** and decisions.
- 3.12 **Inherent Risk** – See **Original Risk**.
- 3.13 **Issue** – the consolidated **Impact** of **Risk(s)** that have occurred. **Action** may be required to address these **Issues**. **Issues** may also introduce additional **Risk(s)**.
- 3.14 **Likelihood** - the chance of something happening. It can be measured either qualitatively (for example, “rarely”, “often”) or quantitatively (for example “50% probability”, “once every five years”).
- 3.15 **Priorities** - A specific goal to be achieved. At the highest level these are defined in our Business Plan priorities; outcomes; Council commitments; and statutory requirements. Directorates; Divisions; Services; and employees will have their own priorities, and others may arise from external codes; legislation; statutory requirements; targets; frameworks; and recommendations.
- 3.16 **Opportunity** - an uncertain future event that would likely have a favourable impact on priorities if it occurred.
- 3.17 **Original Risk** - the exposure arising from an identified **Risk** before any **Actions** or **Controls** have been implemented to manage it. Also called **Inherent Risk**. **Original Risk** is assessed and scored based on its **Likelihood** multiplied by its potential **Impact**.
- 3.18 **Residual Risk** – see **Current Risk**.
- 3.19 **Risk** - the effect of uncertainty upon **Priorities** or service delivery. Risk includes potential upside (**Opportunity**) as well as downside (**Threat**). The description of a **Risk** should include its potential **Cause(s)** and associated **Impact(s)**.

- 3.20 **Risk Appetite** - the amount of [Risk](#) the Council, or a part of it, is willing to accept.
- 3.21 **Risk Management** - the systematic application of principles, tools and processes to identify; record; and assess risks, designing and implementing [Controls](#), and monitoring progress.
- 3.22 **Risk Management Framework** – the Council's risk management toolkit that includes the policies; methodology; procedures; software; governance arrangements; templates; training; education; and communication to support effective identification, assessment and management of risk across the Council.
- 3.23 **Risk Owner** - a single role or individual responsible for the management and control of all aspects of a [Risk](#).
- 3.24 **Spot Controls** - a [Control](#) that identifies an error once it has happened so that it can be addressed (for example quality assurance checks or monitoring trends in key performance indicators).
- 3.25 **Stop Controls** – a [Control](#) that prevents or **Stops** something from going wrong (for example a technology firewall; a reconciliation; or a checklist).
- 3.26 **Target Risk** - The level of [Risk](#) that a [Risk Owner](#) intends to achieve, in line with the Council's [Risk Appetite](#), that is approved by management. This is usually the [Risk](#) remaining after relevant [Controls](#) and [Actions](#) have been successfully implemented and are functioning as intended.
- 3.27 **The Three Lines Model** - The **Three Lines Model** broadly defines first line as 'within services' (the "doers"), second line as 'within corporate support functions' (the "helpers"), and third line as 'Internal Audit, External Audit, and external assurance providers' (the "checkers").
- 3.28 **Threat** - An uncertain event that could have a negative impact on [Priorities](#).

## Policy content

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### **Risk Appetite**

- 4.1 The Council sets an overarching risk appetite to help ensure that risks across all Directorates and Divisions are managed in line with the amount and type of planned risk that the Council is willing to take to deliver its strategic priorities and services. The Council's risk appetite statement is reviewed annually.
- 4.2 Risk appetite can and will vary across levels of seniority and between individuals and groups based on a number of factors including conscious and unconscious bias; knowledge and understanding; and past experience. Risk appetite will change over time and can also vary in similar situations.
- 4.3 Changes in the Council's risk appetite can also be driven by significant external causes (for example the Covid-19 pandemic) where the Council had to accept

increased current risk levels that exceeded its approved risk appetite ranges as risk has had to be managed within the boundaries of new national legislation and guidance.

### **Risk Culture**

- 4.4 The Council promotes a culture where employees can discuss and challenge risks and controls at all levels in a constructive manner, with early identification and proactive recording; reporting; and escalation of risks encouraged.
- 4.5 We should recognise that not all risk is 'bad', and that if we seek to completely avoid risk, then we reduce our chances of delivering the Council's priorities by realising the positive aspects of opportunities.
- 4.6 All strategic and operational decisions should be made with full consideration of risk, and with engagement and input from all relevant stakeholders. Appropriate qualitative and quantitative tools and techniques should be used (where appropriate) to assess risks, and all decisions taken (including appropriate consideration of risk) should be recorded.
- 4.7 All Council employees should consider risk in everything they do in a way that is appropriate and proportionate to their activities, and in accordance with the Council policies and processes in place. This involves identifying and assessing potential opportunities and threats; and then planning and implementing appropriate 'do, stop, and spot' controls and actions to minimise negative risks and impacts to a level that is aligned with risk appetite, enabling the positive aspects of opportunities to be realised.
- 4.8 Risk management roles and responsibilities across the Three Lines are clearly defined and understood across the Council.
- 4.9 Requests for additional resources to manage risk are considered appropriately.

### **Operational Risk Management Framework**

- 4.10 This policy is supported an operational risk management framework that describes the detailed operational risk management processes to be applied across the Council.
- 4.11 The Framework includes this Policy; the Risk Appetite Statement; supporting governance arrangements; procedures and guidance; templates; training and education materials; and communications relating to risk management within the Council.
- 4.12 The Framework is continually reviewed and improved based upon good practice, feedback, and professional risk management developments, and should be consistently and effectively applied across the Council.
- 4.13 Effective application of the Framework involves ensuring that:

- 4.1.1. Risk registers are established and maintained by services that include all relevant risks associated with strategic and operational decisions and ongoing service delivery.
- 4.1.2. Appropriate risk owners have been identified who will be responsible for ongoing management of risks allocated to them.
- 4.1.3. Horizon scanning is performed to identify all new and emerging risks.
- 4.1.4. Risks are appropriately described and classified in line with the Council's established risk description categories included in the operational risk management framework, and include details of risk causes and their potential impacts.
- 4.1.5. Risk assessments are performed based on the likelihood that risks will crystallise, and their associated impact (both before and after implementation of controls) to determine original and current risk levels.
- 4.1.6. An appropriate target risk level is also established (where required).
- 4.1.7. Where necessary, further mitigating actions and / or 'do, stop, and spot' controls are defined to support achievement of target risk, with appropriate action owners and completion timeframes agreed and recorded.
- 4.1.8. Issues are effectively identified and resolved.
- 4.1.9. Project risks are managed within individual projects in line with established project risk management methodologies.
- 4.1.10. The risks associated with suppliers, contractors and other third parties (including Arm's Length External Organisations) are recorded in risk registers and managed appropriately.
- 4.1.11. All significant operational; project; and third party contract current risks are escalated for inclusion in the next level risk committee.

### **The Council's Risk Management Structure and Responsibilities**

- 4.14 The Chief Executive and the Corporate Leadership Team has overall responsibility for the design and application of the Council's Enterprise Risk Management Framework.
- 4.15 A number of these responsibilities are delegated to relevant employees; and Council teams who are accountable for ensuring that they are delivered.
- 4.16 The Council's second line Corporate Risk Management team is responsible and for ongoing maintenance of the Council's operational risk management framework, with the following arrangements established to ensure it is consistently applied across the Council:
  - 4.16.1. Service Directors are accountable for identifying; assessing; recording; and managing their strategic and operational risks in line with the

requirements of the operational risk management framework. These risks should be recorded in service risk registers.

- 4.16.2. Executive Directors should consider the full population of risks that could impact their range of services, with focus on ensuring that Service Directors have identified; recorded; assessed; and are effectively managing their risks.
  - 4.16.3. The Council wide Risk Forum focuses on sharing information about existing and emerging thematic risks with potential impacts across Directorates and overall delivery of Council priorities and services.
  - 4.16.4. Thematic Council-wide risks are considered and discussed within specialist groups such as the Council Health and Safety Group. The Cyber and Information Security Steering Group; and the Information Board.
  - 4.16.5. Risk Committees are held at Corporate Leadership Team and Directorate levels to agree on the Council's most significant risks; the actions required to ensure that these are effectively managed; and risks for inclusion in quarterly risk reports.
  - 4.16.6. The current risk profile of the Council's 13 enterprise risks, as agreed by the Corporate Leadership Team, are reported at least quarterly to the Governance, Risk and Best Value Committee, who provide challenge and scrutiny on an ongoing basis.
- 4.17 Further details on the Council's risk management structure and responsibilities are included in the RACI matrix at Appendix 1, which details the Council committees and employees responsible and accountable for risk management, and those who should be consulted and informed.

### **Assurance**

- 4.18 Assurance on the design and effectiveness of the risk management framework is provided across the Three Lines.
- 4.19 First line services; divisions; and directorates remain responsible for ensuring that their risks are identified; assessed; recorded; managed; and escalated where required.
- 4.20 The second line Corporate Risk Management team can provide ongoing assurance in a 'constructive critical friend' capacity to ensure that the risk management framework is being consistently and effectively applied on an ongoing basis and will make any recommendations for improvement.
- 4.21 Internal Audit (the third line) will assess the design and effectiveness of the risk management framework typically once every five years.

## Implementation

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- 5.1 Implementation of this Policy will be effective from 30 November 2021. This Policy supersedes any previously approved Enterprise Risk Management Policy document

## Roles and Responsibilities

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- 6.1 Further details on the Council's risk management structure and responsibilities are included in the RACI matrix at Appendix 1, which details the Council committees and employees responsible and accountable for risk management, and those who should be consulted and informed.

## Related documents

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- 7.1 All Council policies are designed to reduce risk in some form, and as such they are all related to this document.
- 7.2 In addition to the Council's established policies, key related documents are listed below. This is not a complete list and further guidance may be sought from a member of the Corporate Risk Team.
- 7.2.1 [Council Business Plan 2021- Our Future Council; Our Future City](#)
  - 7.2.2 [Procedural Standing Orders for Council and Committee Meetings](#)
  - 7.2.3 [Committee Terms of Reference and Delegated Functions](#)
  - 7.2.4 [Contract Standing Orders](#)
  - 7.2.5 [Scheme of Delegation to Officers](#)
  - 7.2.6 [Employee Code of Conduct](#)
  - 7.2.7 [Financial Regulations of the City of Edinburgh Council](#)
  - 7.2.8 [Corporate Debt Policy](#)
  - 7.2.9 [The Role of Chief Social Work Officer – Guidance Issued by Scottish Ministers pursuant to Section 5\(1\) of the Social Work \(Scotland\) Act 1968](#)
  - 7.2.10 [Local Government and Housing Act 1989](#)
  - 7.2.11 [Local Government etc. \(Scotland\) Act 1994](#)
  - 7.2.12 [Local Government \(Scotland\) Act 1973](#)
  - 7.2.13 [Social Work \(Scotland\) Act 1968](#)

## Integrated impact assessment

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- 9.1 Direct impact on all Council employees who have always been required to consider the risks associated with all aspects of their roles, including decision making and ongoing service delivery.
- 9.2 Indirect positive impact on all population groups as the Council will consider acceptable levels of risk appropriately when making decisions that could potentially affect these groups and delivering services that they receive.
- 9.3 Indirect positive economic; environmental; and equalities and human rights impacts as any relevant risks will be considered by the Council when making decisions and managing delivery of services.

## Risk assessment

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- 10.1 This policy aims to ensure that effective risk management is embedded throughout the Council. The risks of not implementing this policy include:
  - 10.1.1 The Council could be restricted in its ability to deliver its outcomes and priorities;
  - 10.1.2 Ineffective and inefficient service delivery;
  - 10.1.3 Financial inefficiency and loss; and
  - 10.1.4 Reputational damage to the Council.
- 10.2 Given the uncertainties involved in attempting to quantify future events, even a perfectly functioning risk management framework cannot guarantee to foresee every potential negative impact on the Council. There will always be a chance that very-low-probability/very-high-impact events occur.
- 10.3 Given the scale and nature of the Council's operations it is likely that the Council's reputation will frequently suffer a degree of damage. However, this damage will not usually have significant lasting effects. The Council's Risk Management Framework will therefore prioritise compliance, service delivery and financial impacts above reputational damage.
- 10.4 Implementing his policy should have an overall positive impact on the Council's risk culture.

## Review

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- 11.1 This policy will be reviewed annually by the Policy and Sustainability Committee.
- 11.2 The next scheduled review date is October 2022.

## Appendix 1 – Enterprise Risk Management Responsibilities Across the Council

### Key:

R – Responsible – the employees / committees who have overall responsibility for ensuring the risk management activity is completed

A - Accountable – the employees / committees who will be held to account for completion of risk management activities

C - Consulted – the employees / committees consulted in relation to completion of risk management activities

I - Informed - the employees / committees who are informed that the risk management activity has been completed

**Shaded Areas** – these committees or employees have no responsibility for these specific risk management activities

Enterprise Risk Management Responsibilities	Executive Committees	Governance, Risk and Best Value	Policy and Sustainability	Chief Executive	Corporate Leadership Team	Executive Directors and Chief Officer EIJB	Directorate Operations Managers	Service Directors	Heads of Service	Operational Risk Forum	Head of Audit and Risk / Corporate Risk Mgt Team	Service Director: Legal and Assurance / S5 Monitoring Officer	Service Director: Finance & Procurement / S95 Chief Finance Officer	Service Director: Children's Services & Criminal Justice / Chief Social Work Officer	All Employees
1. Annual review approval of the Enterprise Risk Management Policy (ERMP)		I	R	R	R						A	A			
2. Annual approval of the Council's Risk Appetite Statement (RAS)		I	R	R	R						A	A			
3. Annual refresh of the ERMP					C						R	A			
4. Annual refresh of the RAS					C						R	A			
5. Quarterly Risk Reporting		I		R	C,I	C, I	C, I	C, I	C, I	C, I	A	A	C, I	C, I	C, I
6. Quarterly Risk Committees				R	R	A	A	A	A, C, I	C, I	A,C,I	A,C,I	A	A	C, I
7. Defining and Promoting Risk Culture		I	I	R	A, C	A, C	A, C	A, C	A, C	A	R, A	R, A	A	A	A
8. Maintaining the Operational Risk Management Framework		I		C, I	C, I	C, I	C, I	C, I	C, I	C, I	R	A	C, I	C, I	C, I



<b>Enterprise Risk Management Responsibilities</b>	<b>Executive Committees</b>	<b>Governance, Risk and Best Value</b>	<b>Policy and Sustainability</b>	<b>Chief Executive</b>	<b>Corporate Leadership Team</b>	<b>Executive Directors and Chief Officer EIJB</b>	<b>Directorate Operations Managers</b>	<b>Service Directors</b>	<b>Heads of Service</b>	<b>Risk Forum</b>	<b>Head of Audit and Risk</b>	<b>Service Director: Legal and Assurance / S5 Monitoring Officer</b>	<b>Service Director: Finance &amp; Procurement / S95 Chief Finance Officer</b>	<b>Service Director: Children's Services &amp; Criminal Justice / Chief Social Work Officer</b>	<b>All Employees</b>
9. Considering Risk Appetite in Decision Making	R	I	R	R	A	A	A	A	A	A	A, C, I	A, C, I	A, C, I	A	
10. Training and Education						R			A		A	R		A	
11. Assurance		I		R	R	A	A	A	A	I, A	R	A	A	A	
12. Application of the Operational Risk Management Framework (including resourcing and capacity for risk management activities)		I	I	R	A	A	A	A	A	I	A	A	A	A	
13. Risk management subject matter experts				A			R				R	A			
14. Service delivery in line with relevant legislative / statutory requirements	I	I		R		A		A	A		A	A	A	A	
15. Managing risks associated with legislative and statutory requirements	I	I	I	R	A	A		A	A		A	A	A	A	
16. Identifying and resolving any potential legislative or statutory breaches	I	I	I	R	I	A	A	A	A	C, I	A, C, I	A, C, I	A, C, I	A, C, I	
17. Attending the Corporate Leadership Team in a 'critical friend' capacity				A	A							R	R		