



Circle Housing Group

Mole Valley and Roddons Promises

May 2013

Stage of review	Date
<i>Fieldwork Start Date</i>	18/12/2012
<i>Fieldwork Completion</i>	06/02/2013
<i>Draft Report Issued</i>	08/04/2013
<i>Final Report Issued</i>	30/04/2013

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1 Executive Summary

Introduction

We were asked by management to conduct a review to provide independent assurance that legally-binding promises made as part of the Mole Valley and Roddons stock transfers have been delivered in accordance with agreed timeframes.

Background

Mole Valley District Council transferred 3,500 homes following tenants voting in favour of setting up an independent housing association, Mole Valley Housing Association (MVHA) in October 2007.

Fenland District Council transferred 3,758 homes to Roddons Housing Association (RHA) in November 2007.

Upon stock transfers from local authorities to our Partners, legally-binding 'promises' were made to tenants in respect of, amongst other things, the provision of maintenance services and the development of new homes. These promises were required to be delivered over a five year period. The five year period for both Mole Valley and Roddons expired in the latter half of 2012.

Over the course of the 5 years, the Managing Directors of Mole Valley and Roddons were required to present updates to their respective local authorities on their progress towards delivering promises. These updates were also presented to Partner Boards to give members an opportunity to challenge and scrutinise the progress made by management.

Scope and Approach

We identified the following risks as part of the audit scoping process:

1. Circle is exposed to reputational and legal risk by not being able to demonstrate the delivery of promises made to the local authority and customers at the time of the stock transfer.
2. Future acquisitions or mergers are compromised because Circle is unable to demonstrate that promises made as part of previous stock transfers have been delivered.

We reviewed the status of all promises, as presented in the latest report to each local authority and Partner Board in September 2012, and asked the Senior Management Team at MVHA and RHA to provide documentation to support the progress reported. We used this documentation to verify the status of promises reported to the local authority.

Our Findings

	RHA	MVHA
Total promises at stock transfer	32	46
Evidence obtained to verify status reported as at September 2012	32	46

We obtained evidence to verify the status of all promises reported to Mole Valley District Council and Fenland District Council.

Lessons Learnt

We experienced difficulties in verifying the status of promises pertaining to the replacement of components over the 5 year promises period due to there not being a consistent approach for recording this data. We noted that components replaced by contractors were recorded manually on spreadsheets, whilst Direct Labour Organisation works were recorded on the Orchard, the Groups housing management system.

We were able to provide verification of component replacements after reviewing reconciliation documents provided by Tweeds (independent cost consultant) for MVHA and reviewing total component expenditure incurred over the 5 year period from RHA's on Dream, the Group's financial system.

Going forward, all contracted works undertaken by Partners will be recorded on Orchard. This will assist in the availability of accurate component replacement records. We feel that the following points should be taken into consideration by Partners who have outstanding transfer promises at present or for future Partner acquisitions to support the achievement of transfer promises;

- For Partners with outstanding stock transfer promises (e.g. Merton Priory Homes and Old Ford), an exercise should be undertaken to collate evidence to support the status of transfer promises reported to the local authority;
- A single point of accountability should be established for maintaining and updating management information to support the delivery of transfer promises at relevant Partners;
- An annual assurance exercise could be conducted to ensure the effective monitoring of progress against the Groups outstanding transfer promises.

The Regional Operations Directors have agreed to take on board the above suggestions and will be formulating a strategy to adopt actions by August 2013.

Good Practice

Reporting progress towards promises completion;

- We identified good practice at both MVHA and RHA in regard to the level of information being reported to SMT, Partner Boards and Local Authorities with respect to progress made towards the completion of transfer promises.

Our Conclusion

Overall, we are satisfied with the evidence provided by management to support the status of transfer promises reported to local authorities as at September 2012.

Action should be taken to improve Circle's arrangements for co-ordinating management information and delivering management assurance as to the status of transfer promises going forward.

Report Grading

Low Risk (see Appendix A for justification of grading)

Acknowledgement

We would like to acknowledge all officers involved in assisting the Internal Audit Team in undertaking this review.

2 Detailed Findings (Roddons)

Risks

- Circle is exposed to reputational and legal risk by not being able to demonstrate the delivery of promises made to the local authority and customers at the time of the stock transfer.
- Future acquisitions or mergers are compromised because Circle is unable to demonstrate that promises made as part of previous stock transfers have been delivered.

Transfer Promises made to Fenland District Council November 2007	Timeframe/Deadline	Latest Progress Reported to Fenland District Council September 2012	Internal Audit comment
Theme 1 Delivery of Home Improvements			
<p>1. Home Improvements – To deliver the Fenland Standard by 2012.</p> <p>Target 1-5 years.</p> <p>1500 new kitchens (£4,000 per home)</p> <p>200 new bathrooms (£3,000 per home)</p> <p>700 boiler replacements (£1,500 per home)</p> <p>More electrical sockets when homes are rewired (£2,300 per home)</p> <p>Over-bath electrical showers with new tiling (£750 per home)</p> <p>First floor toilet where requested and where design permits (£1,000 per home)</p> <p>More choice to tenants when homes are improved, for example, allowing tenants more say in the choice of kitchen units.</p>	<p>1-5 years Expired October 2012</p>	<p>Kitchens 1533 fitted in total Promise met</p> <p>Bathrooms 902 fitted in total – Promise met</p> <p>Boilers 884 fitted in total– Promise met</p>	<p>Progress Verified</p> <p>We asked Roddons to provide us with a breakdown of all component replacements completed as part of this promise over the 5 year period as shown in the latest report presented to Fenland District Council in September 2012.</p> <p>We were able to review expenditure from the Dream system showing that the total expenditure raised over this period equated to figures originally agreed in the transfer promise.</p> <p>Management assurance relating to overall component replacements over this period was difficult to verify from Circle's planned maintenance system because, until recently, Roddons have not used Orchard to raise planned works orders. Going forward, Orchard reports will provide management assurance over the number of planned works orders raised.</p>

Transfer Promises made to Fenland District Council November 2007		Timeframe/Deadline	Latest Progress Reported to Fenland District Council September 2012	Internal Audit comment
2.	800 New Fences £1000 per home 1200-900mm at front, 1800mm to the rear. Wooden gates as required.	1-5 years Expired October 2012	723 fences complete. A further 223 have been instructed to Apollo and due to be completed by December 2012.	Progress verified We asked Roddons to provide us with a breakdown of all fencing replacements completed as part of this promise over the 5 year period as shown in the latest report presented to Fenland District Council in September 2012. We were able to review expenditure from the Dream system showing that the total expenditure raised over this period equated to figures originally agreed in the transfer promise. Management assurance relating to overall fencing replacements over this period was difficult to verify from Circle's planned maintenance system because, until recently, Roddons have not used Orchard to raise planned works orders. Going forward, Orchard reports will provide management assurance over the number of planned works orders raised.
3.	400 front of house parking spaces £2,500 per home Dropped kerbs, hard standings to be provided.	1-5 years Expired October 2012	Front of house parking spaces, 410 completed - promise met.	Progress verified We asked Roddons to provide us with a breakdown of all front of house parking spaces completed as part of this promise over the 5 year period as shown in the latest report presented to Fenland District Council in September 2012. We were able to review expenditure from the Dream system showing that the total expenditure raised over this period equated to figures originally agreed in the transfer promise. Management assurance relating to overall front of house parking spaces completed over this period was difficult to verify from Circle's planned maintenance system because, until recently, Roddons have not used Orchard to raise planned works orders. Going forward, Orchard reports will provide management assurance over the number of planned works orders raised.
4.	10 separate off-street parking schemes to be built £40,000 budget	1-5 years. Expired October 2012	10 separate off-street parking schemes built – promise met.	Progress Verified We were provided with details and plans of the 10 parking schemes which had been built for residents as well as a breakdown of costs for each.

Transfer Promises made to Fenland District Council November 2007		Timeframe/Deadline	Latest Progress Reported to Fenland District Council September 2012	Internal Audit comment
5.	<p>1200 Security improvements to homes In consultation with tenants to include;</p> <p>Security Lights for all tenants who request this.</p> <p>Installation of secure doors.</p>	<p>1-5 years Expired October 2012</p>	<p>(NB this requires greater transparency re full schedule of works, years 1-5 for Promises sign-off process).</p> <p>Window restrictors are now being installed to all sheltered scheme properties. This has been started and will continue until the end of financial year.</p>	<p>Progress Verified We obtained a business objects report showing all jobs raised regarding security lighting through the DLO.</p> <p>We were able to review a spreadsheet containing orders for a number of installations of security doors.</p> <p>We were able to review correspondence showing that a window restrictors were fitted to sheltered housing scheme windows during 2012.</p>
6.	<p>A feasibility study to be commissioned on the modernisation of Napier Court, Salem Court and North Witchford Lodge, to consider improvements and the options of conversion to extra care.</p>	<p>1-5 years. Expired October 2012</p>	<p>The Dale has had plans resubmitted following resident consultation.</p> <p>North Witchford Lodge now has plans submitted also.</p>	<p>Progress Verified We reviewed a feasibility study report presented to Roddons Board in May 2010. This report outlines the overall condition and standards of all sheltered schemes within Roddons and plans to further assess each scheme by scheme in consultation with tenants.</p>
Theme 2 Service Improvements				
7.	<p>A decorating scheme to be developed and delivered; For elderly and disabled tenants Every five years tenants would be able to have two rooms of their choice decorated.</p>	<p>1-5 years Expired October 2012</p>	<p>41 residents received the service; a review is underway with Housing Management to establish this Promise post 5 year transfer.</p>	<p>Progress Verified We reviewed data produced from the Business Objects system detailing a total of 567 decorating jobs undertaken as part of this service since 2009.</p>
8.	<p>A subsidised gardening service to be developed and delivered; For elderly and disabled tenants.</p> <p>12 visits per annum</p>	<p>1-5 years Expired October 2012</p>	<p>162 residents received the service. A review is underway with Housing Management to establish the Promises service post 5 year transfer.</p>	<p>Progress Verified We reviewed data showing a total of 241 residents paying a charge of £1.08 a month each for this gardening service. We were also able to obtain copies of the gardening rotas issued to staff to ensure residents receive 12 visits per annum.</p>
9.	<p>Set up an anti social behaviour team So that faster action can be taken to deal with anti-social behaviour, including an out-of-hours service and new evidence gathering equipment.</p> <p>Appoint new team member</p> <p>Set up out of hours service</p> <p>Co-ordinate work with the police and local</p>	<p>1-5 years Expired October 2012</p>	<p>The ASB Service review has now been completed and a meeting will be held to review the recommendations and implement actions.</p>	<p>Progress Verified We obtained assurance that a new staff member has been appointed within the Neighbourhoods team at Roddons to deal with the management of ASB. Management assured us that Fenland District Council are currently undertaking a noise monitoring service on behalf of Roddons. Roddons had obtained quotes for CCTV cameras but no further action was taken.</p> <p>We were able to obtain assurance that co-ordination work with the police and local authority exists regarding ASB. We</p>

Transfer Promises made to Fenland District Council November 2007		Timeframe/Deadline	Latest Progress Reported to Fenland District Council September 2012	Internal Audit comment
	authority			<p>reviewed a number of minutes from Community Safety Partnerships meetings showing a range of community stakeholders in attendance including local police and Fenland District Council members.</p> <p>The evaluation of the Fenland ASB pilot report provided us with assurance that Roddons are working in conjunction with the police and local authority to tackle ASB.</p>
10.	<p>Set up and manage a “community fund” of £1 million for the first 5 years post transfer</p> <p>To improve the quality of life for tenants and residents of Fenland.</p>	<p>1-5 years</p> <p>Expired October 2012</p>	<p>CFSG has agreed priority of Employment and Skills for last tranche of funding – circle £100,000. Plan is to delivery training and skills targeted at tenants to enhance work opportunities. Mark Lowthian and C&PO to meet with partners/agencies to see what they can offer and match it to need. Will need to be match-funded either with money or resources.</p>	<p>Progress Verified</p> <p>We have been able to review procedures relating to the process of acquiring and managing a community fund. We were able to review a monitoring spreadsheet showing where each aspect of the budget for the community fund had been spent over the last 5 years.</p>
11.	<p>Announce the first programme of projects in Fenland that will benefit from the Community Fund</p>	<p>Within the 100 days of transfer.</p>	<p>27 Successful applicants notified in December 2007. Majority have now met with Community & Projects and monitoring has commenced.</p>	<p>Progress Verified</p> <p>We reviewed the Summary of Community Funds Expenditure and Cost Monitoring spreadsheet held by Roddons detailing the amount of budget spent on each community fund project for the 5 year period.</p>
12.	<p>Provision of a Welfare Benefits Advisor</p>	<p>1-5 years</p> <p>Expired October 2012</p>	<p>90 referred tenants seen by MMO, £51,265 extra income for tenants visited by Income Assistants (and referred to MMO where appropriate).</p>	<p>Progress Verified</p> <p>We reviewed reports presented to the Assistant Director Neighbourhoods showing the level of increased income generated once the Welfare Benefits Advisor has visited individual tenants in their home and provided them with financial advice to maximise their income.</p>
13.	<p>Disabled Adaptations</p> <p>An occupational therapist assessment to be undertaken within 4 weeks of a request being made</p> <p>Targets times for adaptations met.</p>	<p>1-5 years</p> <p>Expired October 2012</p>	<p>OT assessments are taking on average 10-12 weeks for appointment</p> <p>62 tenants are still awaiting assessment.</p>	<p>Progress Verified</p> <p>Fenland District Council has been informed that Occupational Therapist assessments are taking in excess of 12 weeks for an appointment to be arranged. We have been able to review management information showing the monitoring of this service and actions put in place to improve target times.</p>
14.	<p>A new handyman service</p> <p>To carry out minor repairs and odd jobs for the elderly and disabled tenants.</p>	<p>1-5 years</p> <p>Expired October 2012</p>	<p>25 handyman tasks have been completed between July and September 2012. Customer Service Teams and trades continue to promote.</p>	<p>Progress Verified</p> <p>Roddons provided Internal Audit with a data compiled from the Business Objects system showing that 191 Handyman Jobs have been completed for elderly and disabled tenants from 2007-2012.</p>

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15.	<p>An easy moves service to be developed and delivered; To provide help if tenant decides to move to another Roddons home.</p> <p>50k per annum</p>	By 31/05/2008	<p>Roddons have completed 1 easy move in quarter 2 making a total of 4 Easy Moves in the ytd.</p> <p>60 applicants are on the Easy Moves list.</p>	<p>Progress Verified We reviewed a number of articles on the Roddons website showing that this service is being advertised and is in operation.</p>
16.	<p>A "Gold Service" reward scheme; for tenants who keep their tenancy conditions to be developed and implemented.</p>	By 30/09/2008	1 winner of £500 plus 9 winners of £100 in July.	<p>Progress Verified We are satisfied that this promise has been upheld as originally agreed for the following reasons: We were able to review examples of tenants being entered into prize draws on a 3 monthly basis, once specific terms of their tenancy had been met, such as; having an up to date rent account and allowing contractors into their home to service gas/oil appliances.</p> <p>We were assured winners are drawn at random and the process is overseen by an Income Resident Tag member.</p>
17.	<p>Improvements to services in sheltered housing;</p> <p>A sheltered housing scheme manager in each sheltered scheme- this is three more scheme managers than with the Council.</p> <p>£10,000 for each sheltered scheme to spend on communal improvements that tenants choose.</p>	<p>By 31/12/2007</p> <p>By 31/03/2008</p>	<p>All posts filled Nov 2009 All projects committed</p>	<p>Progress Verified We have been able to obtain a list showing the names and contact details of managers at all of Roddons sheltered housing schemes.</p> <p>We were able to review a spreadsheet containing a breakdown of all improvements undertaken at each of Roddons Sheltered Schemes. We calculated that an average of £10,454 has been spent over the 15 schemes on items such as garden furniture, curtain replacements and furniture for communal lounges.</p>
18.	<p>An anti-graffiti service To be planned to ensure fast removal of graffiti</p>	<p>1-5 years Expired October 2012</p>	This is an ongoing service	<p>Progress Verified This service is currently delivered by Fenland District Council.</p>
19.	<p>Introduce Allpay – a swipe card facility to be introduced for paying rents.</p>	By 31/03/2008	Implemented	<p>Progress Verified We were able to review management assurance showing the rental payments broken down by payment method. We noted that at week 42 of 2012/13 tenants had chosen to pay their rent up to a total of £959,432.57 using the Allpay method.</p>

Transfer Promises made to Fenland District Council November 2007		Timeframe/Deadline	Latest Progress Reported to Fenland District Council September 2012	Internal Audit comment
20.	Lifeline Service For those who do not live in sheltered accommodation to maintain a 24-hour monitoring service.	1-5 years To commence September 2008	Scheme up and running, all signed up and connected November 2009	Progress Verified We asked Roddons to provide us with details to show the Lifeline Service had been implemented for residents who do not live in sheltered accommodation. We reviewed a spreadsheet showing 25 properties where a lifeline alarm service has been installed in 2012.
21.	A full set of leaflets To be published that describe all aspects of Roddons services	By 31/03/2008	Leaflet in place for each service area	Progress Verified Roddons describe all aspects of their service to their customers and residents through the suite of Key Information sheets produced by Circle. These key information sheets have now superseded the information leaflets produced by Roddons post-transfer.
22.	A new tenant handbook to be produced in different easy-to-read formats and on tape.	By 31/03/2008		Progress Verified We obtained and reviewed the Roddons tenant handbook
Theme 3: Affordable Rents				
23.	Rent increases limited to RPI + 0.5% + £2 per week.	From transfer	Implemented	Progress Verified We obtained assurances that rent increases are now set by legislation. Levels are regularly tested by Group. Internal Audit was involved in sample testing this in 2011 and confirmed compliance with this which can be seen in the Income Management Report 2011.
24.	Housing Benefit The transfer will not affect tenant's entitlement to Housing Benefit.	From transfer	Completed	Progress Verified We are not aware of any impact the transfer has had on tenants ability to claim Housing Benefit at Roddons.
25.	New charges – new service charges for existing tenants would only be introduced if tenants asked for a new service.	From transfer	Implemented	Progress Verified Circle's Group Wide Service Charge policy clearly states that tenants must be fully consulted before they are required to pay new service charges.
26.	Re-let rents – All new tenants will be charged the same rent as an existing tenant in a similar property.	From transfer	Implemented	Progress Verified Due to Affordable Rents strategy devised by the government and monitored by the housing regulator we are no longer able to guarantee this promise.

Transfer Promises made to Fenland District Council November 2007	Timeframe/Deadline	Latest Progress Reported to Fenland District Council September 2012	Internal Audit comment
Theme 4: Tenant Involvement			
<p>27. Tenant involvement – Roddons will regularly seek views on the quality of the services provided and will:</p> <p>work closely with tenants to develop the sort of service they want</p> <p>include an annual budget of £30,000 in its business plan for resident involvement</p> <p>involve tenants in decisions on home improvements</p> <p>provide training in customer care to all members of staff</p> <p>enforce tenancy agreement conditions to deal with disruptive neighbours</p> <p>comply with equal opportunities legislation and best practice</p> <p>provide tenants with regular newsletters</p> <p>conduct customer feedback surveys for tenants leaving homes or transferring to another property owned by the association, and act on the information collected to continue improving services</p> <p>consult on providing an optional tenants' contents insurance scheme</p> <p>Establish a training programme to provide residents with new skills.</p>	<p>From transfer</p>	<p>Working with Tenant Advisory Groups on improving service standards including updating various policy, procedures, direct influence in gardening competition judging and review of tenant expenses with the Circle Policy Team in August.</p> <p>Consultation with residents locally and group wide during June to September 2012 in respect of Repairs & Maintenance Review and Business Transformation.</p> <p>RSP continued to work on their 3rd project on the Neighbourhood Role. Established benchmarking partners with 3 external RPs.</p> <p>RSP further recruitment programme including assessment day during August and September 2012</p>	<p>Progress Verified</p> <p>We are satisfied that this promise continues to be upheld from obtaining the following assurances:</p> <p>We have been able to review resident involvement meeting minutes showing tenant participation and discussion in a number of areas including Resident Involvement Budget and feedback from local conferences.</p> <p>We review an interim assessment undertaken by Tenant Participation Advisory Service Consultancy showing compliance against Resident Involvement Quality. This assessment required Roddons to produce evidence to substantiate a number of standards including equality and diversity points regarding resident involvement. In its Interim Assessment of Roddons TPAS awarded 24 pass marks, 4 partial and 1 fail.</p> <p>Management provided us with a spreadsheet showing how in each case the enforcement of tenancy agreements has been dealt with regarding disruptive neighbours.</p> <p>A Home Matters magazine is sent out quarterly to all Roddons residents.</p> <p>Residents are able to offer their feedback regarding Roddons services through customer surveys. These are recorded and monitored through Circle Reporter.</p> <p>Roddons can provide home contents insurance to their customers under Circle's arrangement with Aviva.</p> <p>We were able to review a tenant skills audit undertaken by the resident involvement team outlining gaps in resident training. This report was then used to put a training workshop plan together which we were able to review.</p> <p>We did not receive any information regarding £30,000 budgeted for resident involvement or details of training for staff in customer care.</p>

Transfer Promises made to Fenland District Council November 2007		Timeframe/Deadline	Latest Progress Reported to Fenland District Council September 2012	Internal Audit comment
28.	A new residents resource centre to be created	At point we move to (Beacon House)	Scoping complete	Progress Verified The resident's resource centre is located at Beacon House.
29.	Increase the Budgets for Tenants Associations and Fenland Residents Forum <i>To be delivered within 100 days of transfer</i>	By 31.02.2008	Significantly improved budgets for 2008/09 agreed with all Tenants and Residents Associations and the Residents' Forum.	Progress Verified We asked Roddons to provide us with assurance that a budget increase could be evidenced for Tenants Associations and Residents Forums post transfer. We were able to review documentation showing the original amount invested by Fenland District Council on resident involvement pre transfer (07/08) was £24k. This was increased to £51k by Roddons in year 08/09 (the first year post stock transfer). We were able to review board papers showing an increase in investment will be maintained by Roddons during 13/14 at £60k.
Theme 5: Delivering Sustainable Communities				
30.	500 new affordable homes <i>To be commenced within 100 days of transfer</i>	Years 1 – 8 (as per agreed variation to original transfer promise January 2011)	Final decant completed at Acacia Avenue. Scheme contract won by Mansells. Start on site due December 2012. Extended design consultation held for Napier Court and The Dale – revised layouts due to be submitted for planning Oct 2012. Terms agreed and internal approvals in place for sites in Chatteris and Manea totalling 54 homes. Planning submitted on a rural exception site for 12 homes in Parson Drove.	Progress Verified Roddons have had difficulty in completing this promise due to issues with land availability, grant availability and planning permission. We understand that 98 of the 500 units have been completed so far and that a time extension has been sought and approved by Fenland District Council regarding this promise. The deadline for the completion of this promise has been extended until March 2016.
31.	New surveillance and noise monitoring equipment to be purchased for ASB monitoring.	1-5 Years By 13.3.2008	Specialist equipment has been researched and purchased.	Progress Verified Management assured us that Fenland District Council is currently undertaking a noise monitoring service on behalf of Roddons.
32.	Delivery of a 21-point ASB Action Plan	1-5 years From transfer Expired October 2012	Satisfaction currently at 100%. Complete	Progress Verified We have been able to review Roddons 24 point action plan in respect of ASB management produced as part of the ASB review undertaken. Resident surveys are conducted by contact staff at Roddons and results are recorded on the Full Circle system. In addition monthly ASB reports are presented to analyse customer satisfaction data and the types of ASB cases recorded.

Appendix A Reporting

Management should make arrangements to monitor the implementation of recommendations agreed within this report and to provide assurances to the Audit and Risk Committee that the recommendations have been implemented. Our audit findings and recommendations are ranked and categorised as set out below:

Priority	Definition
Fundamental	Findings fundamental to the management of the risk.
Significant	Findings important to the management of risk.
Merits attention	Findings, which are relatively minor in nature, but represent the opportunity to improve the management of risk.

Our overall grading of the review area and definitions are set out below:

New audit grading	Steps to be taken
<p>Critical risk There is a significant probability that issues identified in the review may have a fundamental impact on the Partner's/Group's achievement of the Life Chances Objectives.</p> <p>Immediate action should be taken by management to mitigate risks.</p>	<ul style="list-style-type: none"> - The Risk Management Team will be notified immediately of the key issues in the report. - A copy of the draft report to be issued to EDB members. - The Chair of the GARC will be notified of the risk and a full/'early warning' overview will be presented at the next GARC meeting (if the final report not ready) - Include as follow up within six months.

<p>High risk There is a reasonable probability that issues identified in the review have a fundamental impact on the Partner's/Group's achievement of the Life Chances Objectives.</p>	<ul style="list-style-type: none"> - Ensure that management responses are sufficient to improve performance going forward. - Include as part of standard follow up process.
<p>Medium risk There are issues found that impact upon the performance of the area under review but there is a low probability of these issues preventing the Partner/Group from achieving Life Chances Objectives.</p>	<ul style="list-style-type: none"> - Ensure that management responses are sufficient to improve performance going forward. - Include as part of standard follow up process.
<p>Low risk Findings require minor attention but may be of interest to management to enhance performance and meet internal/external best practice.</p>	<ul style="list-style-type: none"> - No specific follow-up required as there are no high priority recommendations.