In line with best practice, the Risk Management Strategy is reviewed annually. The Trust’s risk management processes are reviewed annually by Internal Audit as part of their review of the Board Assurance Framework. The last review, carried out in December 2013 gave an opinion of substantial assurance on the processes in place in the Trust (this is the third consecutive substantial opinion received from the Auditors).

A summary of the strategy on a page is attachment 1 and a flowchart of the risk management process is appendix 2. This year an additional section has been included in the risk management strategy outlining the risk management actions for the coming year.

In order to inform the development of risk management objectives, a risk management assessment has been carried out along with a ‘Risk Management Healthcheck’. The Assurance team has adopted a risk management maturity assessment based on a modified version of the HM Treasury Risk Management Assessment Framework. The framework covers seven core areas with each category having an individual assessment that is then aggregated up to provide an overall rating for the Trust.

To help inform the process, an organisational Risk Management Healthcheck was carried out. The Healthcheck consists of 24 pairs of opposing statements which relate to the respondent’s views on risk management. The Risk Management Healthcheck was first carried out in 2011, and repeated in 2012. Scores are calculated by allocating a value to each response ranging from -5 to +5 resulting in an overall score for each respondent and each question. The average score has increased significantly (see graph below) indicating an increasing risk maturity.

Compared with 2012, 20/24 scores show significant improvements and four scores remain about the same. The results of the Risk Management Healthcheck demonstrate an increasing maturity in relation to risk with almost all scores increasing significantly. The 5 most improved scores are outlined below.

5 most improved scores:
- We rarely get complaints about our work (↑ by 2.8)
- We do not overlook or ignore any risks (↑ by 2.2)
- I understand what risks I am allowed to take (↑ by 2.1)
- I know the main things that threaten achievement of my objectives (↑ by 1.9)
- We spend a substantial amount of time on firefighting/corrective work (↑ by 1.8)
The Trust’s risk maturity matrix score based on the assessment and evidence in relation to each area is:

<table>
<thead>
<tr>
<th>Core Areas</th>
<th>Weightings(w)</th>
<th>Assessed level</th>
<th>Score</th>
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<tr>
<td>Risk leadership</td>
<td>4</td>
<td>4</td>
<td>16</td>
</tr>
<tr>
<td>Risk strategy and policies</td>
<td>3</td>
<td>4</td>
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<td>8</td>
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<td>Risk handling</td>
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<td>3</td>
<td>9</td>
</tr>
<tr>
<td>Outcomes</td>
<td>5</td>
<td>3</td>
<td>15</td>
</tr>
<tr>
<td><strong>Total Score</strong></td>
<td></td>
<td></td>
<td><strong>76</strong></td>
</tr>
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</table>

The overall results of the assessment suggest an overall Risk Maturity Matrix score for the Trust of level 3: “Risk management applied consistently and thoroughly across the organisation”. An action plan to further improve risk maturity is included in the Information Pack. This will be monitored by Risk Committee. Understanding risk appetite and moving from a universal risk averse approach is a key action for 2014/15.

The full version of the Strategy and action plan is included in the information pack.

### Strategic Priorities

1. **Improving Quality and Safety**
   - Reduce harm, deliver best clinical outcomes and improve patient experience through our Quality Improvement Strategy

2. **Delivery of Operational Performance Standards**
   - To develop a transition plan, with supporting mitigation actions and contingency plans, that ensures the safety and short term sustainability of challenged clinical services. 2014/15
   - To address the existing capacity shortfall and process issues to consistently deliver national healthcare standards. 2014/15
   - To undertake a review of all current services at specialty level to inform future service and business decisions. 2015/16

3. **Service Reconfiguration**
   - Complete and embed the successful reconfiguration of Women and Children’s services

4. **Workforce**
   - Develop a sustainable long term clinical services strategy for the Trust to deliver our vision of future healthcare services through our Future Fit Programme
   - Develop our leaders and promote staff engagement to make our organisation a great place to work through our People Strategy

5. **Stakeholder Engagement**
   - Embed a customer focussed approach and improve relationships with our GPs through our Stakeholder Engagement Strategy

6. **Finance and Investment Strategy**
   - Develop a transition plan that ensures financial sustainability and addresses liquidity issues pending the outcome of the Future Fit Programme
   - Develop a robust Investment Strategy to modernise our equipment and estate to support service transformation and increase productivity through the use of technology

### Board Assurance Framework (BAF) Risks

- If we do not deliver **safe care** then patients may suffer avoidable harm and poor clinical outcomes and experience
- If we do not implement our **falls** prevention strategy then patients may suffer serious injury
- Risk to **sustainability** of clinical services due to potential shortages of key clinical staff
- If we do not achieve safe and efficient **patient flow** and improve our processes and capacity and demand planning then we will fail the national quality and performance standards
- If we do not have a clear **clinical service vision** then we may not deliver the best services to patients
- If we do not get good levels of **staff engagement** to get a culture of continuous improvement then staff morale and patient outcomes may not improve
- If we are unable to resolve our (historic) shortfall in **liquidity** and the structural imbalance in the Trust's **Income & Expenditure** position then we will not be able to fulfil our financial duties and address the modernisation of our ageing estate and equipment
| Care Quality Commission (CQC) Domains | □ Safe  
|                                      | □ Effective  
|                                      | □ Caring  
|                                      | □ Responsive  
|                                      | ☑ Well led  
| ☐ Receive  ☑ Note  ☑ Approve | Recommendation  
|                                      | To NOTE the results of the risk management assessment and Healthcheck and APPROVE the Risk Management Strategy and Action Plan  

### Plan On A Page – Risk Management Strategy

#### Definition
Risk management is the process by which the Trust manages the safety of its patients, staff, resources (including information) and environment. The risk management process encompasses the identification and assessment of risks, assigning ownership and monitoring and reviewing progress with the actions taken to mitigate them.

#### Our Aim
- Create a culture where the patient is central to everything we do
- To adopt an integrated approach to the management of risk, ensuring risk management is embedded within the organisational culture, from Ward to Board
- Encourage the open reporting of mistakes, within a ‘just’ culture and that lessons are learnt and actions promptly implemented to prevent recurrence.
- Comply with national standards including CQC, information governance, and emergency planning
- Embed the risk management process supported by the governance committee structure
- Supporting the organisations application for Foundation Trust status by meeting the national risk management requirements
- Accept that risk management is the responsibility of each and every member of staff

#### Our Objectives
- Development of risk appetite levels
- Balance well-managed risk taking to better support effective innovation by enhancing business planning process
- Assessment of local risk management practices at Centre level
- Tailored risk management programme for ward managers leading to improved awareness
- Closer relationships with Local Health Economy
- Working with Health Economy to develop schemes we can all support each other in achieving to promote a cultural shift from sickness to health
- Sustained performance standards
- Developing and implementing an Information Management and Technology strategy.
- Delivering estates strategy
- Delivering planned financial outcomes

We are committed to changing healthcare for the better by being values driven which will have clear and tangible benefits for our patients and our staff. The Trust Board recognises that effective risk management is central to achieving this aim whilst allowing the Trust to make the most of opportunities, (‘Make it Happen’) and minimising the risks taken and should be part of the Trust’s culture and strategic direction. This strategy helps to embed the Trust values by recognising our role as individuals, and as an organisation, is to provide the safest possible care, using the best evidence of what provides the greatest benefit to patients (‘Together we achieve’ and ‘Proud to Care’). Our plans directly link to our overarching principle of “Putting Patients First”

### Our Vision for “Putting Patients First”;

**The Shrewsbury and Telford Hospital NHS Trust, July 2014**

**To ensure that the interests of our patients, and providing the best possible care to them, are at the heart of everything we do**
Appendix 2: Risk Management Flowchart

- Risk identified
  - Risk assessment
  - Business planning
  - Incidents, Complaints, Claims, Coroners Reports

Risk reviewed by Centre / Corporate Department at local governance meeting. If risk score 15 or above, risk to be signed off on risk template by COO or relevant Director, as appropriate.

Action plan to be submitted within one month of risk approved by Centre / Department.

If risk approved, added to risk under relevant Centre/Department risk register.

Centre & Corporate risks more than 15 – collated to form the Trust Risk Register.

Risk and Action Plan discussed at Operational Risk Group – score challenged / moderated and progress monitored.

Quarterly Performance Review:
- Red risks
- Risks with no action plans
- Risks with out of date actions

Relevant risks to Health, Safety & Security or Clinical Governance Executive.

Is this a strategic risk? i.e. if this risk materialises, will it result in failure to achieve Corporate Objective?

YES

Risk Committee for consideration of inclusion on Board Assurance Framework – Risk owner to present risk and action plan to date.

NO

Strategic risks added to Board Assurance Framework.
RISK MANAGEMENT STRATEGY

RM01

To be read in conjunction with: Risk Management Handbook
This document has been subject to an Equality Impact Assessment and is not anticipated to have an adverse impact on any group.

This document has been subject to an Equality Impact Assessment and is not anticipated to have an adverse impact on any group.

Please refer to the SATH intranet for the latest version of this policy. **Any printed copies may not necessarily be the most up to date.**

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1 Statement of Intent
The Shrewsbury and Telford Hospital NHS Trust is committed to changing healthcare for the better by
being values driven which will have clear and tangible benefits for our patients and our staff.

The Trust Board recognises that effective risk management is central to achieving this aim whilst
allowing the Trust to make the most of opportunities, ('Make it happen') and minimising the risks taken
and should be part of the Trust’s culture and strategic direction. This strategy helps to embed the Trust
values by recognising our role as individuals, and as an organisation, is to provide the safest possible
care, using the best evidence of what provides the greatest benefit to patients. ('Together we achieve'
and ‘Proud to care’)

The Trust takes an integrated approach to risk management, irrespective of whether risks are clinical,
non-clinical, financial, operational, business, or strategic with the aim of minimising its exposure to risk.
Risk management is embedded within the Trust’s overall performance management framework, and
linked to business planning. As Accountable Officers, the Board of Directors have legal and statutory
obligations which demand that risk is managed in a strategic and methodical manner. In view of these
statutory duties, it is important that staff are empowered to manage risk at a local level wherever
possible and that clear arrangements are in place to escalate risk issues when it is appropriate.

The Board is committed to an open and honest approach in all matters. It expects all staff to
acknowledge that risks within the Trust can be identified and managed if everyone adopts an attitude
of openness and honesty. The overall approach expected within the organisation is one of help and
support rather than blame and recrimination. ('We value respect') The Trust’s Whistleblowing Policy
complements this approach by providing an alternative mechanism for raising concerns if staff do not
feel able to raise these through the usual routes. The Board acknowledges that the provision of
appropriate training is central to the achievement of this aim.

The Trust Board has delegated responsibility to the Risk Committee for overseeing the development,
implementation and monitoring of this strategy. The Audit Committee undertakes a scrutiny role to
ensure that the systems, structures, and processes for managing strategic risks are in place.

The maternity service has a complementary approved risk management strategy which describes the
processes in place in the Women’s and Children’s Care Group for managing risk in this high risk
environment as required by the CNST standards published by the NHSLA¹.

2 Definition of Risk Management
Risk management is the process by which the Trust will manage the safety of its patients, staff,
resources (including information) and environment. The risk management process encompasses the
identification and assessment of risks, assigning ownership and monitoring and reviewing progress
with the actions taken to mitigate them.

2.1 Definition of Risk
There are many definitions of risk, but most imply that risk is something which should always be
avoided. However, without any risk there would be very few opportunities or innovations. Modernising
and improving our services requires the Trust to take opportunities whilst managing the risks. For the
purpose of this strategy “risk” is defined as -

“an event or action will adversely affect an organisation’s ability to achieve its objectives or
successfully execute its strategies”

Risk has two main components: consequence and likelihood. Consequence is a reflection of the
damage or loss which may occur. Likelihood is an indication of how often the event might occur.
Taken together, they give an indication of how much damage could be caused as a result of unwanted
or unplanned events.
2.2 Risk Appetite
The risk appetite of the organisation determines the balance between not adequately managing risks, therefore leaving the organisation exposed; and over managing risks, stifting creativity and causing loss of opportunity. The Trust risk appetite addresses risk without a culture of blame. By taking a positive approach to risk, the Trust will create greater opportunities and increase the chances of success.

3 Strategy Aims and objectives
The Board needs to be able to demonstrate that they have been properly informed, through the Board Assurance Framework, about all strategic risks facing the organisation, and that they arrived at their conclusions on the totality of risk based on all the evidence presented to them. The purpose of the Risk Management Strategy is to detail the Trust’s framework for setting objectives, providing assurance and managing risk.

The Trust’s key strategic risk management aims are to:
- Create a culture where the patient is central to everything we do
- To adopt an integrated approach to the management of risk, ensuring risk management is embedded within the organisational culture
- Encourage the open reporting of mistakes, within a ‘just’ culture and that lessons are learnt and actions promptly implemented to prevent recurrence.
- Comply with national standards including CQC, information governance, and emergency planning
- Embed the risk management process supported by the governance committee structure
- Supporting the organisations application for Foundation Trust status by meeting the national risk management requirements
- Accept that risk management is the responsibility of each and every member of staff

The Trust’s key risk management objectives for the coming year are:
- Development of risk appetite levels
- Balance well-managed risk taking to better support effective innovation by enhancing business planning process
- Assessment of local risk management practices at Centre level
- Tailed risk management programme for ward managers leading to improved awareness
- Closer relationships with Local Health Economy
- Working with Health Economy to develop schemes we can all support each other in achieving to promote a cultural shift from sickness to health
- Sustained performance standards
- Developing and implementing an Information Management and Technology strategy.
- Delivering estates strategy
- Delivering planned financial outcomes

The risk management action plan is appendix A.

A list of associated policies is at appendix I.

4 Strategic Objectives
The Trust believes it is essential to develop a strategy that is balanced between strategic domains and updates its strategy annually. Each objective has a designated lead Director, responsible for assessing and monitoring the risks associated with delivery of the objective. This assessment forms part of the trust risk register and assurance framework. For 2014/16 the strategic objectives are:
- Reduce harm, deliver best clinical outcomes and improve patient experience through our Quality Improvement Strategy
Develop a transition plan, with supporting workforce plans, mitigation actions and contingency plans, that ensures the safety and short term sustainability of our challenged clinical services
Complete and embed the successful reconfiguration of Women and Children’s services
Address the existing capacity shortfall and process issues to consistently deliver national healthcare standards
Undertake a review of all current services at speciality level to inform future service and business decisions
Develop our leaders and promote staff engagement to make our organisation a great place to work through our People Strategy
Develop a sustainable long term clinical services strategy for the Trust to deliver our vision of future healthcare services through our futurefit Programme
Embed a customer focussed approach and improve relationships with our GPs through our Stakeholder Engagement Strategy
Develop a transition plan that ensures financial sustainability and addresses liquidity issues pending the outcome of the futurefit Programme
Develop a robust Investment Strategy to modernise our equipment and estate to support service transformation and increase productivity through the use of technology

5 Roles and Responsibilities
All members of staff have an individual responsibility for the management of risk and all levels of management must understand and implement the Trust’s risk management strategy. This section details specific lines of accountability and communication, through which the Trust manages risk.

5.1 Chief Executive
The Chief Executive is the Accountable Officer for the Trust and has overall accountability and responsibility for ensuring the Trust meets its statutory and legal requirements and adheres to guidance issued by the Department of Health in respect of governance. This responsibility requires the inclusion in Annual Reports of an Annual Governance Statement. This outlines the controls in place for management of the Trust’s risk exposure. In order to sign this statement on behalf of the Board, the Chief Executive will need to review evidence that the Risk Management Strategy is being implemented, and there is an effective system of internal control.

5.2 Director of Corporate Governance
The Director of Corporate Governance is the lead director for risk management and fulfils the role of Board Secretary. The Director develops corporate risk management strategies and policies interpreting national guidance to fit the local context and the Board Assurance Framework in conjunction with the Trust Board

5.3 Chief Operating Officer
The Chief Operating Officer is the executive lead for emergency planning and business continuity.

5.4 Finance Director
The Finance Director is responsible for financial risk management and for providing regular, timely, and accurate financial reports to the Board in line with requirements and accounting standards

5.5 Directors
Each Director has delegated responsibility for the delivery of specific objectives and therefore for assessing the risks associated with the delivery of those objectives. This includes a Quality Impact Assessment on all CIP schemes. It is the responsibility of each Director and their management team to implement local arrangements which accord with the principles and the objectives set out in this strategy. Each Director has overall responsibly for ensuring that information held on the risk register and Board Assurance Framework is up to date and accurately reflects the current status.
5.6 **Head of Assurance**  
The Head of Assurance is responsible for the coordination of risk management issues on behalf of the Director of Corporate Governance. This includes supporting the Risk Committee and Operational Risk Group and development of the risk registers.

5.7 **Management Teams**  
The Management Teams are responsible for ensuring participation in the Trust’s Governance systems by ensuring Groups and Centres have local risk management systems in place detailing arrangements in their areas of responsibility including ongoing risk assessment.

Specific responsibilities are outlined in an appendix E to this document

6 **Risk Management Organisational Structure**  
The Trust governance (committee) structure is shown at appendix B. Terms of reference will be reviewed annually and approved by the relevant committee to which they report. The following committees have specific functions relating to risk management:

6.1 **Trust Board**  
The Trust Board is responsible for ensuring that the Trust follows the principles of sound governance. The Board is required to produce statements of assurance that it is doing its “reasonable best” to ensure the Trust meets its objectives and protect against risks of all kinds. In relation to this strategy the Trust Board will:  
- Have a structured risk identification system covering all possible risks to its objectives, with robust controls in place for the management of identified risks including action and contingency plans  
- Develop appropriate monitoring and review mechanisms that provide independent assurance to the Board that the system of risk management across the trust is effective

6.2 **Risk Committee**  
The Trust Board has delegated responsibility for risk management to the Risk Committee which is the Trust committee with overarching responsibility for risk. The Risk Committee provides assurance to the Trust Board that the systems for risk management and internal control are effective. The Risk Committee is responsible for ensuring that all significant risks are properly considered and communicated to the Trust Board. The Terms of Reference are at appendix C.

6.3 **Operational Risk Group**  
The Operational Risk Group is tasked with collating risk assessments from throughout the Trust and presenting them in coherent and robust risk registers. The group will ensure that assessments are normed and that the information gathered is complete and up-to-date. The Terms of Reference are at appendix D.

6.4 **Clinical Governance Executive**  
This committee is chaired by the Medical Director and meets monthly. Clinical risks will be monitored by this group

6.5 **Health, Safety and Security Committee**  
The committee is chaired by the Director of Corporate Governance and meets quarterly. Non-clinical risks relevant to the terms of reference will be monitored by this group.

6.6 **Trust Audit Committee**  
The Audit Committee, a formal sub-committee of the Board, provides overview and scrutiny of risk management. The terms of reference have been devised in line with the Audit Committee Handbook to reflect its role as the senior Board committee taking a wider responsibility for scrutinising the risks and controls which affect all aspects of the organisation’s business including oversight and scrutiny of the Trust’s systems of internal control and risk management.
6.7 Quality and Safety Committee
This Committee is a formal sub-committee of the Board established to provide assurance to the Board on clinical Quality & Safety, (including Clinical Effectiveness, Patient Safety, and Patient Experience) utilising best practice metrics that provide robust clinical governance processes to deliver safe, high quality and patient centred care. Any risks to quality would be referred to this Committee by the Clinical Governance Executive for oversight.

7 The Risk Management System
The Trust embeds risk management through the full and formal adoption of the national NHS framework, the Australian / New Zealand Risk Management Standard 4360:2004. A summary of the risk management process in at appendix F.

In order to comply with this standard a continuous risk management process with an agreed methodology to analyse the range of potential consequences and likelihood of occurrence of risks must be in place. The Trust uses the national NPSA classification 5 x 5 matrix (Appendix G)

7.1 Risk Types
The main types of risk facing by the Trust fall into two categories:

Strategic Risks: are those that represent major threats to achieving the Trust’s strategic objectives, or to its continued existence. Strategic risks can include key operational failures which would be very damaging to the achievement of the strategic objectives if they materialised. Being clear about strategic risk enables the Board to be sure that the information it receives is relevant to the achievement of these objectives.

Operational Risks: These concern the day to day issues that the Trust faces as it strives to deliver its strategic objectives. Operational risks include a broad range of risks including clinical risks, fraud, financial risks etc. These risks therefore have the potential to stop the Trust achieving nationally or locally agreed targets or may have such an impact on service delivery that the Trust becomes in breach of contract with the commissioners, or spreads across more than one area. These risks are the responsibility of line management and should be identified and managed by the executive and only considered by the Board in a high level summary form in order that they have an overview of the totality of risk facing the Trust.
Risks on the Board Assurance Framework are usually strategic risks as these are the risks which will most impact on achievement of corporate objectives; some operational risks may be considered by the Board to be so significant, if they materialise, that they will be included on the Board Assurance Framework.

7.2 Risk Identification
Risk identification is the process of identifying what can happen or has happened and why. The first step is to review business plan objectives, identifying the key risks that may impact upon the ability of the Trust, Care Group or Centre to achieve its objectives. The Trust has produced a risk management handbook which includes guidance for risk assessment to assist line managers. The approach to risk identification should be both pro-active and reactive.

7.2.1 Proactive risk identification:
Proactive risk assessment enables the Trust to identify actual or potential hazards and ensure adequate control measures are in place to mitigate the risk. Proactive risk assessments fulfils the Trust’s statutory duty in terms of Health and Safety risk assessments. Ongoing proactive risk assessment will minimise the likelihood of incidents occurring and will support safety improvements across the Trust. There are several processes in place to allow this to be undertaken for example: internal inspections carried out by specialist advisers eg infection control, fire, health and safety; audits and benchmarking.
7.2.2 Reactive risk identification
Reactive risk assessments should take place after adverse events to minimise the likelihood of these events recurring. For example, following incident reports, complaints and claims, root cause analysis takes place and can result in risks being identified for inclusion on risk registers. Similarly, an external assessments / reviews of Trust services could result in risks being identified.

7.2.3 Quality Impact Assessment (QIA) of Improvement Programme schemes
In assessing the impact of proposed improvement programme schemes on the ability to deliver commitments to quality as defined within the Annual Corporate Plan, the Quality KPIs, and the Monitor requirements of clinical outcomes; patient experience and patient safety, each scheme will need to be risk scored for its potential to have an adverse impact on these three dimensions of quality.

7.3 Risk Evaluation
All risks, independent of their origin, are evaluated using the Trust’s risk matrix (appendix G). Risk scores have two components: consequence and likelihood. The evaluation is the assessment of the “likelihood” that the controls put in to manage a risk are likely to fail, and determining the “consequences” arising from that failure. The two scores are multiplied together to give a risk score of between 1 and 25. The subsequent colour rating, from the risk matrix, identifies the level at which risks will be managed within the Trust.

7.3.2 Risk Controls
As part of risk assessment is it essential to describe the controls in place i.e. policies, procedures, protocols, training or physical safeguards in place to mitigate or manage the risk and secure the delivery of an objective.

7.3.3 Risk Owners
The risk management process specifies risks which need to be actively managed. These are assigned a risk owner who is accountable for owning and reporting on the risk and overseeing the development and maintenance of appropriate controls and mitigation. While the risk owner has overall accountability for the management of the risk, they may not own or operate the control(s) which relates to the risk. In this case, the role of the risk owner is to oversee that the control(s) are owned, are fit for purpose and operate effectively and that identified actions are implemented by the action owners.

7.4 Addressing Risks – Action plans
Once a risk has been identified, it is important to consider the additional control measures which can be put in place to reduce the risk. A balance must be found between the potential impact if the risk comes to fruition and the costs of additional controls. The Trust is required to manage its risks in such a way that people are not harmed and losses are minimised to the lowest acceptable level. Action plans are required for all high and medium risks. These action plans will be monitored though Care Group and Centre governance systems. For high risks, progress against action plans will be monitored by the Operational Risk Group. There are several possible courses of action:

Treat the risk (risk elimination or risk reduction)
It is expected that most risks identified will be treated. The purpose of treatment is not necessarily to eliminate the risk completely but, more likely, to put in place a plan of mitigating actions to contain the risk to an acceptable level.

Terminate the risk
This is a variation of the “treat” approach, and involves quick and decisive action to eliminate or avoid a risk altogether. The introduction of new technology may remove certain existing risks, although it will often result in a new set of risks to be addressed.

Transfer the risk
This may be done through insurance or by asking a third party to take on the risk in another way.
Contracting out some of the Trust’s services, for example, transfers some, but not all risks (and often introduces a new set of risks to be managed)

**Tolerate the risk**
The ability to take effective action against some risks may be limited, or the cost of taking action may be disproportionate to the potential benefit gained. In this instance, the only management action required is to monitor the risk to ensure that its likelihood or impact does not increase. If new management options arise, it may become appropriate to treat this risk in the future.

**Avoid the risk**
This an informed decision not to become involved in a risk situation or to cease activities in a particular area because the risk is too high

**Exploit the risk**
The potential to exploit opportunities when actions are taken to mitigate or transfer the risk, as should the opportunity to redeploy resources where risks are terminated

It should be noted that there are some instances where a risk may be deemed unacceptable and yet still be tolerated by the organisation. For example the cost of treating the risk may be prohibitive or the risk may be untreatable.

**7.3.1 Action Owners**
Risk owners may not be in a position to take all the necessary actions to mitigate a risk. Action owners are nominated individuals with responsibility for taken the required actions. An individual risk may have several identified actions – and each of these may have a different action owner.

**7.3.2 Funding of Control Measures**
Groups and departments are responsible for funding the cost of control measures, which relate to risks identified as being within the control of the Care Group/Department.

**7.3.3 Risk Contingencies**
For risks that may occur contingency plans should be developed in case they do. Contingency plans should be appropriate and proportional to the impact of the original risk. In many cases it is more cost effective to allocate a certain amount of resources to mitigate a risk rather than start by developing a contingency plan which, if necessary to implement, is likely to be more expensive.

**7.3.4 Reassessment**
All risks must be periodically reviewed and re-assessed in view of contextual changes. It is recommended that reviews of risk assessments take place quarterly within the Care Groups, and anytime a process change is about to occur, or a new hazard is identified. However, throughout the Trust, risk assessment is an ongoing process with the risk registers being constantly updated.

**8 Managing the Trust Risk Registers**
Registers of risks are held on the web-based risk register system (4risk). This allows risk and action owners to update the status of assigned risks and actions. The system holds a structured set of risk registers for each area and corporate department, as well as strategic and trust-wide risks.

**8.1 Responsibility and accountability arrangements**
The trust aims to empower staff to assume responsibility for effective risk management by setting out a framework that meets the needs of the day to day management practice and encourages a freedom to act hierarchy. This means that risk assessment can take place throughout the hierarchy; for example individual staff can undertake risk assessments, within a ward or department; ward or department heads may undertake assessment for their department. The results of this feed into local action plans or risk reduction programmes, or Care Group / Centre / service level risk registers in circumstances where the outcome suggests the need for involvement outside the immediate team.
The level at which risks will be managed / escalated is shown below:

<table>
<thead>
<tr>
<th>Risk Colour (score)</th>
<th>Remedial Action</th>
<th>Action</th>
<th>Decision to accept risk</th>
<th>Risk Sign off</th>
<th>Level of Monitoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very low (0-3)</td>
<td>Individual</td>
<td>watching brief</td>
<td>Ward / Service Manager</td>
<td>Service Head</td>
<td>Ward / Service Line</td>
</tr>
<tr>
<td>Low (4 – 6)</td>
<td>Ward/ Service Manager</td>
<td>retain and manage risk</td>
<td>Service Head</td>
<td>Service Head</td>
<td>Service Line</td>
</tr>
<tr>
<td>Medium (8 – 12)</td>
<td>Service Head</td>
<td>attempt to manage avoid or transfer risk</td>
<td>Centre Management Team</td>
<td>Assistant COO* / Centre Manager</td>
<td>Centre / Care Group Governance meeting</td>
</tr>
<tr>
<td>High (15 – 25)</td>
<td>Centre, Care Group Management Teams, Executive Directors</td>
<td>Eliminate or transfer risk</td>
<td>Operational Risk Group (operational risks) &amp; Risk Committee (strategic risks - BAF)</td>
<td>Assistant COO*+ / COO or relevant Director</td>
<td>Centre, Care Group, Operational Risk Group, Risk Committee &amp; Trust Board</td>
</tr>
</tbody>
</table>

* Assistant COO must sign off risks for Scheduled and Unscheduled Care Groups

8.2 Acceptability of risk
The acceptability of risk is a complex issue and will vary according to local circumstances. Acceptable risk can be defined as the residual risk remaining after controls have been applied to known hazards. In relation to operational risks, it will be the responsibility of individual Care Groups to decide what level of risk is acceptable. In respect of strategic risks, it will be the responsibility of the Chief Executive, as Accountable Officer, to determine the acceptability of a risk.

8.3 Local Risk Registers
Each service and corporate department must maintain a comprehensive risk register of its identified risks with agreed action plans. The responsibility for maintaining the local risk register will be that of the service head who has responsibility for clearly delegating actions to named individuals. It is expected that local registers will contain risks identified from a number of sources including analysis of incidents (clinical and non-clinical), complaints and claims; benchmarking against national guidance and national reports; patient safety alerts; patient and staff surveys; business planning and performance. The registers should be discussed at local governance meetings where clinical and non-clinical risks should be identified and discussed.

8.4 Local Management of Risk
Responsibility for the management, control, and funding of a particular risk lies within the Care Group/Department concerned. However, when action to control a risk falls outside the remit of a Care Group or cannot be dealt with at that level, it will be escalated. All Care Groups and Centres will have a mechanism for signing off all medium and high risks. Risks scoring 15 or over must be signed off by the appropriate Director. For Care Groups, this will be the Chief Operating Officer. For scheduled and unscheduled Care Groups, high risks should also be signed off by the Assistant Chief Operating Officer. The risk should then be forwarded with a risk reduction plan to the Operational Risk Group (ORG). The ORG will discuss the risk and agree the risk scoring taking account of all known factors. An outcome summary of the ORG will be reported to the Risk Committee which will include any amendments to the register. If appropriate, ORG will recommend that the risk owner be invited to the Risk Committee to present the risk.

8.5 Risk Profiles
Each quarter at Operational Risk Group, services and departments will be expected to report on their top red risks and by exception update on action plans for minimising those risks. In addition to the top risks, the ORG will also discuss the following items quarterly:
- Overall risk profile
- Risks which have been red for more than a year
8.6 Process for the Executive Review of Risk and Board Assurance Framework

All risks scoring 15 or above must be signed off by the appropriate director, usually the Chief Operating Officer, to ensure executive oversight of high risks.

The Risk Committee will review the Board Assurance Framework (BAF) quarterly and will receive a high level extract of the risk register at this meeting.

8.6.1 Managing the Trust Board Assurance Framework

The Board Assurance Framework (BAF) represents all the agreed strategic risks of the Trust. It is developed annually by the Board who will review quarterly known and potential strategic risks. Whilst strategic risks will automatically migrate to the BAF, the Trust management team, with assistance from the Operational Risk Group and sub-committees, will determine whether or not any other risks from the risk registers should be considered at the Risk Committee for inclusion in the BAF.

Any significant operational risks which cannot be controlled within the Care Groups and corporate departments will be considered for inclusion on the Trusts Board Assurance Framework (BAF) following discussion with the appropriate director and ORG. Risk Owners will present such risks at the Risk Committee for discussion and consideration and explain the reason why the risk cannot be managed, together with a suggested course of action. This will provide a structure to aid the analysis of risks and the process of making decisions about risk treatment.

The Board Assurance Framework will be presented at least three times a year to the Audit Committee and Trust Board by the Director of Corporate Governance.

9 Sub-certification of Annual Governance Statement

As part of the Annual Governance Statement Care Groups and corporate Heads of Department will be required to sub certify (see appendix H) that, at year end, local risk register:

- is up-to-date,
- reflects all risks rated at 8 or above in their areas of responsibility
- identifies the controls currently in place for the identified risks
- identifies actions to mitigate the risk (with dates and named individuals)
- Identifies the assurances (received or planned) that will demonstrate that the risk is adequately managed.

10 Training, development and appraisal

Training and education are key elements in establishing and maintaining the risk management culture. It provides staff with the necessary knowledge and skills to work safely and to minimise risks at all levels. This process starts at induction: all staff must have a local induction and are required to attend a corporate induction programme on joining the Trust. This includes an introduction to the risk management culture within the Trust.

A corporate training plan is drawn up and regularly reviewed comprising training required under legislation and any other training deemed to be mandatory by the Trust for an individual to undertake the duties. Advice and information on training is available from the Learning Zone on the Intranet. Every employee will have personal objectives linked to the corporate objectives, including training reviewed annually at the time of appraisal. Where appropriate personal objective and development plans will link to identified risks.
10.1 Risk awareness training for senior managers and Board Members
Board members and other identified senior managers\(^1\) will be appropriately trained and skilled in risk management for their role. They will be provided with bespoke risk awareness training to ensure they have a clear understanding of their role and responsibilities for risk management.

The Executive and Non-Executive Directors will receive training as part of the annual Board Development Programme. The content is likely to vary from year to year but will include presentations and discussions of new developments, legislation or standards in risk management.

Senior managers and Care Group management teams (excluding admin support) will receive risk management training as part of the annual Trust Leadership Team training. The content is likely to vary from year to year but will cover updates on relevant risk management issues and clarification of roles and responsibilities in relation to risk management.

11 Communication and Consultation
Managers are responsible for communicating the Risk Management Strategy and associated documents to all their staff. The strategy and associated documents can be accessed through the Trust Intranet (risk management pages) so that they are readily available in departments.

12 Monitoring Mechanisms
The Risk Committee has responsibility for overseeing the implementation of this strategy. This will include production of an annual report to demonstrate the continuing effectiveness of the risk management system.

Internal Audit and the Audit Committee have responsibility for monitoring the risk management system and providing appropriate verification to the Chief Executive and Board. Each year the Trust will be required to develop an Annual Governance Statement that confirms that action has been taken to manage risk and to publish this statement in its annual report.

13 Approval and Review Mechanisms
The policy has been developed in the light of currently available information, guidance and legislation that may be subject to review. In order that the Risk Management Strategy remains current, any of the appendices to the strategy can be amended and approved during the lifetime of the strategy without the entire strategy having to return to the Board. The strategy as a whole will be reviewed and ratified annually by the Board (or sooner if there are significant changes at national policy level).

Trust Board approved the policy on

And becomes effective on

\(\text{Signed}\) \(\text{Signed}\)
\(\text{Dated}\) \(\text{Dated}\)

\(^1\) see Trust ‘Who’s Who on a Page’
### Appendix A  Risk Management Action Plan

<table>
<thead>
<tr>
<th>Ref</th>
<th>Recommendation</th>
<th>Priority (low, medium, high)</th>
<th>Exec Director</th>
<th>Action Owner</th>
<th>Implementation Date</th>
<th>Update on position</th>
<th>RAG</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>Risk appetite levels to be developed and communicated to management teams</td>
<td>Medium</td>
<td>Director of Corporate Governance</td>
<td>Head of Assurance</td>
<td>Mar 15</td>
<td>Amber Green</td>
<td></td>
</tr>
<tr>
<td>1.2</td>
<td>Balance well-managed risk taking to better support effective innovation by enhancing business planning process</td>
<td>Medium</td>
<td>Director of Business and Enterprise</td>
<td>Head of Planning</td>
<td>Mar 15</td>
<td>Amber Green</td>
<td></td>
</tr>
<tr>
<td>2.1</td>
<td>Further develop the business planning / business case process to link to identified risks</td>
<td>Medium</td>
<td>Director of Business and Enterprise</td>
<td>Head of Planning</td>
<td>Mar 15</td>
<td>Amber Green</td>
<td></td>
</tr>
<tr>
<td>2.2</td>
<td>Assessment of local risk management practices at Centre level – report findings to OPG and Risk Committee</td>
<td>High</td>
<td>Internal Audit</td>
<td>Head of Assurance</td>
<td>Mar 15</td>
<td>Amber</td>
<td></td>
</tr>
<tr>
<td>3.1</td>
<td>Deliver tailored programme for centre ward managers on risk management strategy and risk registers</td>
<td>High</td>
<td>Director of Corporate Governance</td>
<td>Head of Assurance</td>
<td>Sept 14</td>
<td>Amber</td>
<td></td>
</tr>
<tr>
<td>4.1</td>
<td>Closer relationships with Local Health Economy – CEO/Chair meetings, Director meetings</td>
<td>High</td>
<td>CEO</td>
<td>n/a</td>
<td>Sept 14</td>
<td>Red</td>
<td></td>
</tr>
<tr>
<td>4.2</td>
<td>Working with Health Economy to develop schemes we can all support each other in achieving to promote a cultural shift from sickness to health where we begin to focus much more proactively on admission avoidance, care closer to home</td>
<td>High</td>
<td>CEO</td>
<td>n/a</td>
<td>Mar 15</td>
<td>Amber Red</td>
<td></td>
</tr>
<tr>
<td>5.1</td>
<td>Better understanding of risk management at ward/department level (measured by RM Healthcheck)</td>
<td>High</td>
<td>Director of Nursing and Quality</td>
<td>Head of Assurance</td>
<td>Sept 14</td>
<td>Amber</td>
<td></td>
</tr>
<tr>
<td>Ref</td>
<td>Recommendation</td>
<td>Priority</td>
<td>Exec Owner</td>
<td>Action Owner</td>
<td>Implementation Date</td>
<td>Update on position</td>
<td>RAG</td>
</tr>
<tr>
<td>-----</td>
<td>--------------------------------------------------------------------------------</td>
<td>-----------</td>
<td>--------------------------------</td>
<td>--------------------</td>
<td>--------------------</td>
<td>--------------------</td>
<td>------</td>
</tr>
<tr>
<td>5.26.2</td>
<td>Stronger inclusion of risk management in business planning processes</td>
<td>Medium</td>
<td>Director of Business and Enterprise</td>
<td>Head of Planning</td>
<td>Dec 14</td>
<td></td>
<td>Amber</td>
</tr>
<tr>
<td>7.1</td>
<td>Sustained performance standards</td>
<td>High</td>
<td>Chief Operating Officer</td>
<td>Asst COOs</td>
<td>Sept 14</td>
<td></td>
<td>Amber Red</td>
</tr>
<tr>
<td>7.2</td>
<td>Developing and implementing an Information Management and Technology strategy.</td>
<td>Medium</td>
<td>Finance Director</td>
<td>Head of T</td>
<td>Mar 15</td>
<td></td>
<td>Amber Red</td>
</tr>
<tr>
<td>7.3</td>
<td>Delivering estates strategy</td>
<td>Medium</td>
<td>Finance Director</td>
<td>Head of Estates</td>
<td>Mar 15</td>
<td></td>
<td>Amber Red</td>
</tr>
<tr>
<td>7.4</td>
<td>Delivering planned financial outcomes</td>
<td>High</td>
<td>Finance Director</td>
<td>Deputy Finance Director</td>
<td>Mar 15</td>
<td></td>
<td>Amber Red</td>
</tr>
</tbody>
</table>
Appendix B  Trust Governance Structure

SaTH Committee Structure
April 2014

Key
- includes NED member
- proposed new Committee

Executive Directors Meeting

Trust Board

Clinical Quality & Safety Committee
Audit Committee
Risk Committee
Remuneration Committee
Business Development & Engagement Committee
Finance Committee (inc. Charitable Funds Committee)
Workforce Committee
Hospital Executive Committee

Policy Approval Group
Operational Performance Group
Information Governance Group
IT Review Group
Sustainable Development Committee

Infection Prevention and Control Committee
Blood Transfusion Committee
Clinical Audit Committee
Clinical Product Evaluation Committee
Drugs & Therapeutics Committee
Incident Review Group
Local Safeguarding Committee
Medical Devices Committee

Medical Records Committee
Mortality Group
Nursing & Midwifery Forum
Nutrition Group
Organ Donation Group
Patient Engagement and Involvement Panel
Research and Development Committee
Resuscitation and Patient Deterioration Group
Safe Medication Practice Group

Care Group/Centre Governance Meetings
Appendix C  Risk Committee Terms of Reference

Terms of Reference

Risk Committee

Constitution

The Risk Committee reports to the Trust Board and oversees the ongoing development, implementation and monitoring of the Trust’s Risk Management Strategy. This includes overview of the most significant risks to the achievement of the Trust’s objectives to ensure there are robust controls and mitigation actions in place.

The Committee will be required to adhere to the Standing Orders of the Trust.

<table>
<thead>
<tr>
<th>Membership</th>
<th>Nominated Deputy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Executive (Chair)</td>
<td>Director of Nursing &amp; Quality (Deputy Chair)</td>
</tr>
<tr>
<td>Director of Nursing &amp; Quality</td>
<td>Deputy Director of Nursing &amp; Quality</td>
</tr>
<tr>
<td>Medical Director</td>
<td>Deputy Medical Director (Clinical Performance)</td>
</tr>
<tr>
<td>Director of Corporate Governance</td>
<td>Head of Assurance</td>
</tr>
<tr>
<td>Chief Operating Officer</td>
<td>Assistant Chief Operating Officer – Scheduled Care</td>
</tr>
<tr>
<td>Non-Executive Director</td>
<td>Non-Executive Director</td>
</tr>
<tr>
<td>Head of Assurance</td>
<td>Health &amp; Safety Manager</td>
</tr>
<tr>
<td>Finance Director</td>
<td>Deputy Finance Director</td>
</tr>
<tr>
<td>Workforce Director</td>
<td>Deputy Workforce Director</td>
</tr>
<tr>
<td>Communications Director</td>
<td>Communications Manager</td>
</tr>
<tr>
<td>Director of Business and Enterprise</td>
<td>Head of Planning</td>
</tr>
</tbody>
</table>

Attendance when required:

<table>
<thead>
<tr>
<th>Member</th>
<th>Nominated Deputy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Finance Director</td>
<td>Deputy Finance Director</td>
</tr>
<tr>
<td>Workforce Director</td>
<td>Deputy Workforce Director</td>
</tr>
<tr>
<td>Communications Director</td>
<td>Communications Manager</td>
</tr>
<tr>
<td>Director of Business and Enterprise</td>
<td>Head of Planning</td>
</tr>
</tbody>
</table>

Quorum

For the Committee to be quorate, the presence of at least 4 members or their nominated deputy is required.

Attendance

Members may appoint suitable deputies to represent them. Deputies must attend when required. It is expected that a member or their nominated deputy will attend for a minimum of 75% of meetings in a year. Attendance will be monitored by an attendance matrix.

Frequency

The Risk Committee shall meet quarterly. Additional meetings may be held at the discretion of the Chair.

Authority

Authority for all decisions relating to risk management lies with the Trust Board of The Shrewsbury and Telford Hospital NHS Trust. The Committee has delegated powers from the Trust Board to oversee the risk management arrangements within the Trust and is authorised to investigate any activity within its terms of reference.
Duties

- Oversee the implementation and further development of the Trust’s Risk Management Strategy ensuring it supports the achievement of the Trust’s objectives and business plan.
- Provide a clear statement of the risk appetite for the management of risk throughout the organisation.
- Assess and review the composition and ongoing development of the Board Assurance Framework ensuring it provides a robust tool through which the Board can monitor management of the organisation’s key strategic risks, ensuring effective control and assurance mechanisms in place and that effective actions are being taken to address gaps in controls and assurance.
- Provide the Trust Board with assurance that a comprehensive Trust wide Risk Register is maintained which will enable the Board to have a shared and clear understanding of the key risks in the Trust; what mitigations are in place to manage risks and which risks are being tolerated.
- Identify and validate new strategic risks and consider whether they pose a principle risk to the Trust’s strategic objectives and should be included on the Board Assurance Framework.
- Ensuring Director risk owners and risk action owners have plans in place to control identified risks and to take necessary action to ensure remedial plans are put into place should mitigation fall behind plan.
- Identify potential threats and opportunities that may impact on the achievement of the Trust’s objectives.

Reporting from the Committee

The Committee will be directly accountable to Trust Board.

The Chairman of the Committee will report on the proceedings of each meeting to the next meeting and will draw to the attention of the Trust Board any matters of concern in relation to the effective management of the organisation’s risks.

The Chairman of the Committee will ensure that the Trust Board receives the Trust’s Board Assurance framework.

The Risk Committee will produce an annual risk management report for the Trust Board.

Reporting to the Committee

The Operational Risk Group and Health & Safety and Security Committee will report to the Risk Committee.

Review

The Terms of Reference will be reviewed by the Board of Directors annually.

March 2014

V6
Appendix D  Operational Risk Group Terms of Reference

Constitution
The Operational Risk Group (ORG) reports to the Risk Committee and supports the Trust’s governance Committees in ensuring risk assessment and risk reduction plans are in place across the Trust. ORG will be required to adhere to the Standing Orders of the Trust.

Membership

<table>
<thead>
<tr>
<th>Core Members</th>
<th>Member</th>
<th>Nominated Deputy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Director of Corporate Governance (Chair)</td>
<td>J Clarke</td>
<td>C Jowett</td>
</tr>
<tr>
<td>Head of Assurance (Deputy Chair)</td>
<td>C Jowett</td>
<td>K Titley</td>
</tr>
<tr>
<td>Assistant Chief Operating Officer – Scheduled Care</td>
<td>S Biffen</td>
<td>L Gill / K Malpass</td>
</tr>
<tr>
<td>Assistant Chief Operating Officer – Unscheduled Care</td>
<td>I Donnelly</td>
<td>A Trumper</td>
</tr>
<tr>
<td>Acting Deputy Director of Nursing &amp; Quality</td>
<td>J Banks</td>
<td>G Mitchell</td>
</tr>
<tr>
<td>Women &amp; Children Care Group</td>
<td>C Smith</td>
<td>T Kirby</td>
</tr>
<tr>
<td>MES Manager</td>
<td>T Penrose</td>
<td></td>
</tr>
<tr>
<td>Health and Safety Team Manager</td>
<td>K Titley</td>
<td>H Smith</td>
</tr>
<tr>
<td>Head of Contracts &amp; Performance</td>
<td>P Hodson</td>
<td>S Taylor</td>
</tr>
<tr>
<td>Head of IT</td>
<td>N Appleton</td>
<td>G Madin / G Thelwell</td>
</tr>
<tr>
<td>IPC representative</td>
<td>P O’Neill</td>
<td>J Pritchard</td>
</tr>
<tr>
<td>Head of Estates</td>
<td>C Needham</td>
<td>T Penrose</td>
</tr>
<tr>
<td>Deputy Director of Finance</td>
<td>J Price</td>
<td>A Parkinson</td>
</tr>
<tr>
<td>Deputy Workforce Director</td>
<td>J Hulse</td>
<td>S Hayes</td>
</tr>
<tr>
<td>Head of Planning</td>
<td>T Finch</td>
<td></td>
</tr>
<tr>
<td>Security Manager</td>
<td>J Simpson</td>
<td>-</td>
</tr>
<tr>
<td>Legal &amp; Compliance Manager</td>
<td>S Mashadi</td>
<td>-</td>
</tr>
</tbody>
</table>

Care Group Medical Directors / Clinical Directors / Centre Managers

Risk Owners

Can attend any meeting. Must attend to present new risks. Must attend if outstanding actions for Care Group and as required to present updates to action plans. Must attend a minimum of 1 meeting per quarter. Will receive agenda and minutes.

Directors (or Nominated Deputy)

Must attend to present new risks. Can attend any meeting. Will receive agenda and minutes.

The Group can call upon any member of staff to attend to discuss specific issues.

Quorum
The Chair or Vice-Chair should be present, plus five members or their nominated deputy. At least one Care Group must be represented.

Attendance
Core members may appoint suitable deputies to represent them. Deputies must attend when required. It is expected that a core member or their nominated deputy will attend for a minimum of 75% of meetings in a year. New risks will not be discussed if the relevant Care Group /Department is not represented at the meeting. Attendance will be monitored by an attendance matrix.

Frequency
ORG shall meet monthly. Additional meetings may be held at the discretion of the Chair.
**Authority**

The meeting will consider risks identified by Care Groups /departments and through corporate incidents e.g. serious untoward incidents, CQC inspections, MHRA/SABs alerts/ H&S and audit recommendations.

The Trust Risk Register (scores of 15 or above) will be presented quarterly to the Risk Committee with any changes to the highest risks being reported in-year.

New risks will not be considered unless they have gone through due process as described in the risk register procedure. All new risks should have an associated action(s) and this will be reviewed quarterly.

**Duties**

ORG will:

1. Identify and validate new risks and consider whether they should be forwarded for inclusion on the Board Assurance Framework

2. Review all risks with a risk score of 15 or above.

3. Ensuring risk owners and risk action owners have plans in place to review all risks and rank them to ensure remedial plans are put into place should mitigation fall behind plan by quarterly review of action plans.

4. Oversee the maintenance and further development of the Centre/Departments Risk Registers as key tools to support achievement of high levels of internal control, patient safety, and clinical quality to inform risk based decision making and specifically promote local level responsibilities and accountability for identifying and mitigating the organisations risks.

5. If ORG are not happy with progress, refer matter to COO/Director meeting, highlighting:
   - The top 3 risks for each Centre/Corporate Department
   - High (red) risks with unchanged scores for more than 12 months
   - Any risk not mitigated in line with the target date including risks with actions past their original implementation date
   - Risks with no actions recorded on 4Risk within 1 month of identification

6. Review findings and ensure implementation of recommendations arising from internal audits of Trust risk and compliance processes

7. Review and monitor actions arising from Regulation 28 letters from the Coroner, inquests, claims, and solicitor’s risk management reports

8. Ensure the CQC framework is up to date and any outstanding actions are being progressed by the relevant area, and receive the CQC Intelligent Monitoring Report.

9. To receive BAF on a quarterly basis.

**Reporting from the Committee**

The Committee reports to the Clinical Governance Executive and supports the work of the Trust Risk Committee.

**Reporting to the Committee**

All risks from tier 3 and tier 4 committees, along with Care Group risks will be discussed at ORG.

**Review**

The Terms of Reference will be reviewed annually.

March 2014 – V10
Appendix E Responsibilities

Trust Board of Directors
The Board as a whole is responsible for reviewing the effectiveness of internal controls and for managing the Trust efficiently and effectively.

Chief Executive
The Chief Executive has overall responsibility for ensuring the implementation of an effective risk management system, supported by the Director of Corporate Governance and other key individuals (see below) with delegated responsibility.

Non-Executive Directors
The Non-Executives are accountable to the Secretary of State. They are expected to hold the Executive to account and to use their skills and experience to make sure that the interests of patients, staff and Trust as a whole, remain paramount. They have a significant responsibility for scrutinising the business of the Trust particularly in relation to risk and assurance.

Directors
Whilst the Chief Executive has overall responsibility he delegates various aspects of risk management, including implementation of this strategy as follows:

<table>
<thead>
<tr>
<th>Director</th>
<th>Area of Risk Management Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Executive Directors</strong></td>
<td></td>
</tr>
<tr>
<td>Chief Operating Officer</td>
<td>Business Continuity</td>
</tr>
<tr>
<td></td>
<td>Care Groups</td>
</tr>
<tr>
<td></td>
<td>Major Incident Planning</td>
</tr>
<tr>
<td>Director of Nursing and Quality</td>
<td>Child and Adult Protection</td>
</tr>
<tr>
<td></td>
<td>Clinical Governance (with Medical Director)</td>
</tr>
<tr>
<td></td>
<td>Infection Prevention and Control</td>
</tr>
<tr>
<td></td>
<td>Nursing and Midwifery Practice</td>
</tr>
<tr>
<td></td>
<td>Patient Experience</td>
</tr>
<tr>
<td></td>
<td>Patient Safety</td>
</tr>
<tr>
<td>Finance Director</td>
<td>Finance</td>
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<td></td>
<td>Fraud prevention</td>
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<td>Information Governance</td>
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<td>SIRO</td>
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<td>Performance and Contracts</td>
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<td>Estates and Facilities</td>
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<td>Environmental</td>
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<td>Medical Director</td>
<td>Caldicott Guardian</td>
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<td>Clinical Safety Officer</td>
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<td>Patient Outcomes</td>
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<tr>
<td></td>
<td>Clinical Governance (with Director of Quality &amp; Safety)</td>
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<td>Information Technology</td>
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<td>Medical Education</td>
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<td>Medical Practice</td>
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<td>Medicines Management</td>
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<td>Research and Development</td>
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<td>Revalidation</td>
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<tr>
<td>Directors</td>
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<td>Communications Director</td>
<td>Media</td>
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<td></td>
<td>Reputation Management</td>
</tr>
<tr>
<td>Director of Corporate Governance</td>
<td>Risk and Assurance Framework</td>
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<td></td>
<td>Foundation Trust programme</td>
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<td></td>
<td>Health and Safety</td>
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<td></td>
<td>Legal Services</td>
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<tr>
<td></td>
<td>Security Management</td>
</tr>
<tr>
<td>Director of Business and Enterprise</td>
<td>Business planning</td>
</tr>
<tr>
<td></td>
<td>Future Configuration of Hospital Services</td>
</tr>
<tr>
<td></td>
<td>Strategy</td>
</tr>
<tr>
<td>Workforce Director</td>
<td>Human Resources</td>
</tr>
<tr>
<td></td>
<td>Organisational Development</td>
</tr>
</tbody>
</table>
Training and Development
Director of Corporate Governance
- Lead Director for risk management
- Fulfils the role of Board Secretary
- Develop corporate risk management strategies and policies interpreting national guidance to fit the local context
- Develop the Board Assurance Framework (BAF) in conjunction with the Trust Board

Head of Assurance
- Develop and maintain the risk registers, providing advice and guidance on use of the electronic risk register (4Risk)
- Maintain the BAF
- Oversee the running of the Operational Risk Group and Risk Committee ensuring risks are reported, assessed and managed though the submission of the risk registers
- Produce an annual risk management report for the Risk Committee
- Keep an up to date assurance schedule of planned external visits and audits (clinical and non-clinical)

Head of Legal and Security Services
The Head of Legal and Security Services is responsible for claims management, liaising with solicitors and insurers to ensure timely and cost effective claims handling. They are also responsible for liaison with HM Coroner and the Police. They ensure that any risk management issues/actions identified during a claim, or inquest is referred for action.

Security Manager
The Trust’s Security Manager is accountable to the Director of Corporate Affairs in their role as Local Security Management Specialist (LSMS) and is responsible for developing systems for the security of staff, patients, property and assets

Health & Safety Team Manager
The Trust Health & Safety Team Managers reports to the Head of Assurance and is the Trust lead for Health and Safety. Their duties include planning, advising and monitoring the Trust’s day to day compliance with:
- The Health and Safety at Work etc, Act 1974 and the relevant statutory Regulations and provisions of appropriate Approved Code Of Practice
- All procedures that comprise The Shrewsbury and Telford NHS Trust’s Health and Safety Framework (See Policy on Intranet for more details)

Deputy Director of Nursing and Quality
Reports to the Director of Quality and Safety and is responsible for;
- Developing and maintaining effective clinical risk systems. Specifically ensuring effective systems for reporting incidents and near misses, appropriate investigations (including root cause analysis) are carried out, feedback is given, and an accurate database is maintained.
- Trend analysis and the identification and notification of serious incidents to the Board and external stakeholders.
- Supporting the Care Groups through education and communication in their Clinical Governance programmes

Associate Director of Patient Experience
Reports to the Director of Nursing and Quality and is responsible for;
- Management and coordination of formal complaints ensuring that required follow up action is taken to prevent a recurrence
- Trend analysis and the identification and notification complaints to the Board
- Oversees the Patient Advice and Liaison Services (PALS).

Research and Development Director
The Research and Development Director is responsible for management of research, and research governance processes. Incidents arising from research will be reported via the Trust’s incident reporting procedure.

Head of Education
The Head of Education is responsible for coordinating education, development and training activities within the Trust and leads on the use of the NHS Knowledge and Skills Framework
**Director of Estates and Facilities**
The Director of Estates and Facilities has corporate responsibility for all relevant fire safety legislation and NHS Fire Code; and compliance with the Environmental Protection Act 1990, together with associated Acts & Regulations;

**Head of Facilities**
The Trust’s Head of Facilities is accountable to the Director of Estates and Facilities Management for:
- The Food Safety Act 1990 and Food Safety (General Food Hygiene) Regulations 1995 together with other associated Acts and Regulations

**Other specialist support**
For managers or staff who need specialist support, it is available from the following post holders for their respective area of expertise:
- Director of Infection Prevention and Control (DIPC)
- Fire Safety Advisor
- Occupational Health Service
- Estates Professionals
- Catering/Food Hygiene Professionals
- Medical Equipment Professional
- Union Safety Representatives
- Moving & Handling Advisors
- Human Resources Advisors
- Finance Manager
- Local Counter Fraud Specialist
- Information Governance Manager
- Child Protection Lead
- Vulnerable Adults Lead
- Chief Pharmacist

**Care Group / Centre Management Teams**
The Management Teams have delegated responsibility for assessment, management and reporting of risks within their areas and engaging all staff in this process. In particular, they will be responsible for:
- Ensuring all areas have local risk management systems in place and that all staff are made aware of the risks within their work area and of their personal responsibilities in relation to risk management.
- Ensuring there are effective systems in place for the identification, management and review of risks including risks to the achievement of CQC standards
- Ensuring risk registers are in place and escalate identified risks to the Operational Risk Group in line with the requirements of this strategy.
- Ensuring risk assessments are taken forward and appropriate and sufficient controls are established and maintained to ensure that the risk is managed at the lowest reasonably practicable level.
- Ensuring that their staff receive the required level of information and training to enable them to work safely and comply with Trust policies and that they are competent to identify, assess and manage risk within their areas.
- Completing sub certification to support the Annual Governance Statement
- Ensuring the promotion of an open, reporting and learning culture

**Responsibilities of all Employees**
All staff are expected to:
- Report to their line manager any perceived risk in the area which requires assessment and management and participate in risk assessment and risk control as required
- Report incidents/accidents and near misses using Datix.
- Attend training as identified by their manager through appraisal, or as stated in the Trust risk management training policy.
Appendix F  Information Flows for Risk

Risk Management Process

Risk identified
- Risk assessment
- Business planning
- Incidents, Complaints, Claims, Coroners Reports

Risk reviewed by Centre / Corporate Department at local governance meeting. If risk score 15 or above, risk to be signed off on risk template by COO or relevant Director, as appropriate

If risk approved, added to 4 risk under relevant Centre/Department risk register

Action plan to be submitted within one month of risk approved by Centre / Department

Centre & Corporate risks more than 15 – collated to form the Trust Risk Register

Risk and Action Plan discussed at Operational Risk Group – score challenged / moderated and progress monitored

Quarterly Performance Review:
- Red risks
- Risks with no action plans
- Risks with out of date actions

Relevant risks to Health, Safety & Security or Clinical Governance Executive

Is this a strategic risk? i.e. if this risk materialises, will it result in failure to achieve Corporate Objective?

YES

NO

Risk Committee for consideration of inclusion on Board Assurance Framework – Risk owner to present risk and action plan to date

Strategic risks added to Board Assurance Framework
<table>
<thead>
<tr>
<th>Descriptor</th>
<th>Insignificant</th>
<th>Minor</th>
<th>Moderate</th>
<th>Severe</th>
<th>Catastrophic</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Safety</strong></td>
<td>None or minimal harm – no intervention required H&amp;S – Little chance of injury or illness due to lack of maintenance or process.</td>
<td>Minor avoidable injury or illness, requiring minor intervention H&amp;S – small chance of injury or illness</td>
<td>Moderate avoidable injury requiring professional intervention (RIDDOR reportable) H&amp;S – moderate chance of injury or illness due to lack of maintenance or failure in process</td>
<td>Major avoidable injury leading to long term incapacity / disability H&amp;S – Probable serious injury due to lack of maintenance or failure in process</td>
<td>Incident leading to avoidable death or serious permanent harm (for example e.g. wrong site surgery or loss of vision.) H&amp;S – Probable fatality due to lack of maintenance or failure in process.</td>
</tr>
<tr>
<td><strong>Quality</strong></td>
<td>Peripheral element of treatment or service sub optimal Informal complaint</td>
<td>Clinical outcome not affected OR increase in length of stay 3 – 10 days (department level) Overall treatment or service suboptimal Minor implications for patient safety if unresolved</td>
<td>Individual consultant clinical outcome in lower 25% for up to a month OR increase in length of stay for large number of patients &lt;15 days (Care Group level) Repeated failure to meet internal standards Patient safety implications if findings are not acted on</td>
<td>Individual consultant clinical outcome in lower 10% for up to a month OR specialty clinical outcomes in lower 25% for up to one month OR increase in length of stay for large number of patients &gt;10 days (Trust level) Non-compliance with national standards with significant risk to patients if unresolved Multiple complaints/ independent critical report</td>
<td>Individual consultant clinical outcome in lower 10% for in-excess of 3 months OR specialty clinical outcomes in lower 25% for over one month OR increase in length of stay for significant number of patients &gt;10 days (Trust level) Gross failure of patient safety if findings are not acted on Inquest PFD potential/ ombudsman inquiry Gross failure to meet national standards</td>
</tr>
<tr>
<td><strong>Finance</strong></td>
<td>Costs within the remit of individual employees as set by the Scheme of delegation 0.5% of budget OR Major impact on budget holder’s financial position</td>
<td>Financial impact £100k - £250k</td>
<td>Financial impact £250k - £1 million</td>
<td>Financial impact £1 million+</td>
<td></td>
</tr>
<tr>
<td><strong>Service / Business Interruption Environmental impact</strong></td>
<td>Loss / interruption &gt; 1 hour OR Minimal / no impact on environment OR Little damage to machinery / equipment</td>
<td>Loss / interruption &gt; 1 day (department level) OR Minor impact on environment OR Moderate damage to machinery, easily repairable</td>
<td>Loss / interruption &gt; 1 day (Care Group level) OR Moderate impact on environment OR Machinery shut down immediately and restarted in less than half a day</td>
<td>Loss / interruption &gt; 1 week OR Major impact on environment OR Machinery will be out of action more than a week to repair</td>
<td>Permanent loss of service or facility (Trust level) OR Catastrophic impact on environment OR Damage will spread beyond one item of machinery and take over one week to repair</td>
</tr>
<tr>
<td><strong>Service Delivery / business management</strong></td>
<td>Failure to meet individual objectives set out in KSF process or minimal impact</td>
<td>Failure to meet internal standards with some impact on overall performance of business unit</td>
<td>Failure to meet internal standards with some impact on overall performance of Trust</td>
<td>Major impact on overall performance which puts achievement of standards or ability to meet Monitor risk rating and national requirements at risk</td>
<td>Sustained failure to meet standards or failure to meet Monitor risk rating and national requirements. Serious impact on overall performance and possible intervention</td>
</tr>
<tr>
<td><strong>Adverse Publicity / Reputation</strong></td>
<td>Minimal impact</td>
<td>Short term local interest and impact from an issue (e.g. leading to reduced public confidence in a service)</td>
<td>Moderate or short term impact on reputation leading to moderately reduced public confidence in the Trust</td>
<td>Major or medium term impact on reputation leading to significantly reduced public confidence in the Trust</td>
<td>Serious and long term impact on reputation leading to total loss of public confidence in the Trust</td>
</tr>
<tr>
<td><strong>Human Resources / Organisational Development</strong></td>
<td>Nil</td>
<td>Low staffing level reduces service quality</td>
<td>Late delivery of key objective / service due to lack of staff (recruitment, retention or sickness). OR Unsafe staffing level or competence (&gt;1 day).OR OR Low staff morale OR Poor staff attendance for mandatory / key training</td>
<td>Uncertain delivery of key objective / service due to lack of staff OR Unsafe staffing level or competence (&gt;5 days) OR Loss of key staff. Very low staff morale. OR No staff attendance for mandatory / key training.</td>
<td>Non delivery of key objective / service due to lack of staff OR Ongoing unsafe staffing levels or competence. OR Loss of several key staff OR No staff attending mandatory / key training on an ongoing basis</td>
</tr>
</tbody>
</table>
### Risk Likelihood: Frequency or Probability Score

<table>
<thead>
<tr>
<th>Descriptor</th>
<th>1 Rare</th>
<th>2 Unlikely</th>
<th>3 Possible</th>
<th>4 Likely</th>
<th>5 Almost certain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Frequency</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>How often might it/does it happen?</td>
<td>Highly unlikely but it may occur in exceptional circumstances. It could happen but probably never will.</td>
<td>Not expected but there's a slight possibility it may occur at some time</td>
<td>The event might occur at some time as there is a history of casual occurrence at the Trust or within the NHS</td>
<td>There is a strong possibility the event will occur as there is a history of frequent occurrence at the Trust or within the NHS</td>
<td>Very likely. The event is expected to occur in most circumstances as there is a history of regular occurrence at the Trust or within the NHS</td>
</tr>
<tr>
<td>Probability</td>
<td>&lt;0.1 percent</td>
<td>0.1 – 1 percent</td>
<td>1 – 10 percent</td>
<td>10 – 50 percent</td>
<td>&gt; 50 percent</td>
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<tr>
<td>ie will it happen or not within given time frame?</td>
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<td></td>
<td></td>
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</table>

### Risk Quantification Matrix

<table>
<thead>
<tr>
<th>Likelihood</th>
<th>Consequence</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>1 Insignificant</td>
</tr>
<tr>
<td>5 - Almost Certain</td>
<td>5</td>
</tr>
<tr>
<td>4 - Likely</td>
<td>4</td>
</tr>
<tr>
<td>3 - Possible</td>
<td>3</td>
</tr>
<tr>
<td>2 - Unlikely</td>
<td>2</td>
</tr>
<tr>
<td>1 - Rare</td>
<td>1</td>
</tr>
</tbody>
</table>

### Risk Rating: level at which risks will be managed

- **High** - Prompt action is required, so far as is reasonably practicable. Risk MUST be signed off by COO or deputy and then notify OPERATIONAL RISK GROUP.
  - MANAGEMENT BY CENTRE Will be included in quarterly performance reviews
  - Strategic risks only for consideration of inclusion on BAF via RISK COMMITTEE.

- **Medium** - Risk reduction is required, so far as is reasonably practicable.
  - PROACTIVE REVIEW and MANAGEMENT BY CENTRE with assurance through local governance.

- **Low** - Risk within tolerance. Risk reduction is required, so far as is reasonably practicable.
  - ONGOING REVIEW & MANAGEMENT by DEPARTMENTS with assurance through local governance.

- **Very Low** - Risk within tolerance and further risk reduction may not be feasible or cost effective. MONITORING AT OPERATIONAL LEVEL.
| Risks which directly threaten the Corporate Objectives are strategic risks and must be escalated to Risk Committee. All other risks are operational and will be managed in line with RM Strategy |

V19 Dec 2013
I certify that the [ ] Risk Register:

- is up-to-date,
- reflects all risks rated at 8 or above in my areas of responsibility
- identifies all the controls currently in place for the identified risks
- identifies timed actions for mitigation of all identified risks
- Identifies the assurances (received or planned) that will enable [ ] to demonstrate that the risk is adequately managed.

For any lapses please provide details of action taken:

Signature

Date

Position
Appendix I  Related Policies and Procedures

Reservation of Powers to the Board and Delegation of Authority
Standing Financial Instructions and Standing Orders

Risk Management Handbook
Corporate Risk Register
Board Assurance Framework
Women’s Risk Management Strategy

An Organisation-wide Policy for the Development and Management of Procedural Documents (Gov 01)

Procedure for the reporting and Investigation of incidents, complaints and claims
Serious Incident policy
Learning from adverse events policy

Health and Safety Policy
Health and Safety Risk Assessment Templates
Claims Handling policy
Complaints policy
Fire Policy
Security Policy
Major Incident Plan

Induction Policy
Whistleblowing policy HR05
Maintaining high standards of performance
Maintaining high professional standards for Doctors and Dentists
Knowledge and Skills Framework
Training and Development Support

Infection Control Policies
Resuscitation Policy
Medical Devices Policy
Medical Equipment Training Policy

Appendix J  References

1  CNST maternity Clinical Risk Management Standards NHSLA (January 2011)
Appendix 1: Risk Management Healthcheck Results

Risk Management Healthcheck Results

- Risk management affects all managers
- Risk management is a crucial part of my job
- Risk management is extremely valuable
- I fully understand the risk management policy
- It is very worthwhile to maintain risk registers
- I know the main things that threaten the achievement of my objectives
- I am held accountable for the achievement of my objectives
- I have a thorough understanding of risk management
- I discuss risks regularly with my direct reports
- I understand fully the objectives I am expected to achieve
- I am totally clear about what is expected of me in terms of risk management
- I understand what risks I am allowed to take
- The culture encourages people to identify and report risks to me
- I've done something to control main things that threaten my objectives
- My boss frequently/regularly discusses risks with me
- The benefits of risk management far outweigh the work it requires
- We rarely get complaints about our work
- My risk register is an up-to-date reflection of what I am actually doing
- We actively analyse and learn from things that have gone wrong previously
- Our reputation is excellent
- We do not overlook or ignore any risks
- The general attitude towards risk management is positive
- Work is always completed on time, within budget and to a good quality
- We spend a substantial amount of time on firefighting or corrective work
<table>
<thead>
<tr>
<th>Ref</th>
<th>Recommendation</th>
<th>Priority (low, medium, high)</th>
<th>Exec Director</th>
<th>Action Owner</th>
<th>Implementation Date</th>
<th>Update on position</th>
<th>RAG</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>Risk appetite levels to be developed and communicated to management teams</td>
<td>Medium</td>
<td>Director of Corporate Governance</td>
<td>Head of Assurance</td>
<td>Mar 15</td>
<td></td>
<td>Amber Green</td>
</tr>
<tr>
<td>1.2</td>
<td>Balance well-managed risk taking to better support effective innovation by enhancing business planning process</td>
<td>Medium</td>
<td>Director of Business and Enterprise</td>
<td>Head of Planning</td>
<td>Mar 15</td>
<td></td>
<td>Amber Green</td>
</tr>
<tr>
<td>2.1</td>
<td>Further develop the business planning / business case process to link to identified risks</td>
<td>Medium</td>
<td>Director of Business and Enterprise</td>
<td>Head of Planning</td>
<td>Mar 15</td>
<td></td>
<td>Amber Green</td>
</tr>
<tr>
<td>2.2</td>
<td>Assessment of local risk management practices at Centre level – report findings to OPG and Risk Committee</td>
<td>High</td>
<td>Internal Audit</td>
<td>Head of Assurance</td>
<td>Mar 15</td>
<td></td>
<td>Amber</td>
</tr>
<tr>
<td>3.1</td>
<td>Deliver tailored programme for centre ward managers on risk management strategy and risk registers</td>
<td>High</td>
<td>Director of Corporate Governance</td>
<td>Head of Assurance</td>
<td>Sept 14</td>
<td></td>
<td>Amber</td>
</tr>
<tr>
<td>4.1</td>
<td>Closer relationships with Local Health Economy – CEO/Chair meetings, Director meetings</td>
<td>High</td>
<td>CEO</td>
<td>n/a</td>
<td>Sept 14</td>
<td></td>
<td>Red</td>
</tr>
<tr>
<td>4.2</td>
<td>Working with Health Economy to develop schemes we can all support each other in achieving to promote a cultural shift from sickness to health where we begin to focus much more proactively on admission avoidance, care closer to home</td>
<td>High</td>
<td>CEO</td>
<td>n/a</td>
<td>Mar 15</td>
<td></td>
<td>Amber Red</td>
</tr>
<tr>
<td>5.1 6.1</td>
<td>Better understanding of risk management at ward/department level (measured by RM Healthcheck)</td>
<td>High</td>
<td>Director of Nursing and Quality</td>
<td>Head of Assurance</td>
<td>Sept 14</td>
<td></td>
<td>Amber</td>
</tr>
<tr>
<td>5.2 6.2</td>
<td>Stronger inclusion of risk management in business planning processes</td>
<td>Medium</td>
<td>Director of Business and Enterprise</td>
<td>Head of Planning</td>
<td>Dec 14</td>
<td></td>
<td>Amber</td>
</tr>
<tr>
<td>Ref</td>
<td>Recommendation</td>
<td>Priority (low, medium, high)</td>
<td>Exec Director</td>
<td>Action Owner</td>
<td>Implementation Date</td>
<td>Update on position</td>
<td>RAG</td>
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</tr>
<tr>
<td>7.1</td>
<td>Sustained performance standards</td>
<td>High</td>
<td>Chief Operating Officer</td>
<td>Asst COOs</td>
<td>Sept 14</td>
<td></td>
<td>Amber Red</td>
</tr>
<tr>
<td>7.2</td>
<td>Developing and implementing an Information Management and Technology strategy.</td>
<td>Medium</td>
<td>Finance Director</td>
<td>Head of T</td>
<td>Mar 15</td>
<td></td>
<td>Amber Red</td>
</tr>
<tr>
<td>7.3</td>
<td>Delivering estates strategy</td>
<td>Medium</td>
<td>Finance Director</td>
<td>Head of Estates</td>
<td>Mar 15</td>
<td></td>
<td>Amber Red</td>
</tr>
<tr>
<td>7.4</td>
<td>Delivering planned financial outcomes</td>
<td>High</td>
<td>Finance Director</td>
<td>Deputy Finance Director</td>
<td>Mar 15</td>
<td></td>
<td>Amber Red</td>
</tr>
</tbody>
</table>