London Borough of Hammersmith & Fulham

Audit, Pensions and Standards Committee Minutes



ACTION: Nick Austin

Wednesday 21 June 2017

PRESENT

Committee members: Councillors Iain Cassidy (Chair), Ben Coleman, Vivienne Lukey, PJ Murphy, Guy Vincent, Michael Adam, Nicholas Botterill, Mark Loveday and Donald Johnson

Other Councillors: Councillor Stephen Cowan (Leader of the Council)

Officers: Kim Dero (Interim Chief Executive), Hitesh Jolapara (Strategic Finance Director), Peter Carpenter (Head of Treasury and Pensions), Jane Martin (Interim Director for Property Services), Chris Culleton (Principal Compliance Manager), David Hughes (Director for Audit, Fraud, Risk and Insurance), Andrew Hyatt (Head of Fraud), Geoff Drake (Senior Audit Manager), Dave McNamara (Director of Finance and Resources in Children's Services), Mike Boyle (Director for Strategic Commissioning and Enterprise in Adult Social Care), Mike Sloniowski (Risk Manager), and David Abbott (Scrutiny Manager)

1. MINUTES OF THE PREVIOUS MEETING

Councillor PJ Murphy reiterated his request for information on the proportion of absenteeism caused by stress within the organisation.

RESOLVED

The minutes of the previous meeting, held on 21 March 2017, were approved and signed by the Chair.

2. <u>APOLOGIES FOR ABSENCE</u>

Apologies for lateness were received from Councillor Mark Loveday.

3. DECLARATIONS OF INTEREST

There were no declarations of interest.

4. <u>APPOINTMENT OF VICE CHAIR</u>

RESOLVED

That Councillor Michael Adam be appointed Vice Chair for the Municipal Year 2017-18.

5. PENSIONS SUB-COMMITTEE MEMBERSHIP

RESOLVED

That the Committee approved the following membership of the Pensions Sub-Committee for 2017-18:

- Councillor Iain Cassidy (Chair)
- Councillor PJ Murphy
- Councillor Guy Vincent
- Councillor Michael Adam
- Councillor Nicholas Botterill

6. TREASURY OUTTURN REPORT 2016-17

Peter Carpenter, Head of Treasury and Pensions, presented the Council's Outturn Treasury Report for 2016-17 and noted that the overall treasury position at year end was higher than the previous year at £327m. Returns were down by around £300,000 because of low interest rates. Due to the level of cash held (£327m at 31 March 2016) it was anticipated that no new borrowing would be required in 2016-17.

Councillor Michael Adam, referring to paragraph 5.27 of the report, noted that the average return on investment was 45 basis points (0.45 percent). He asked if the higher yield investments agreed by members would come through this year – and if there was room to accept some more risk in this area for higher returns. Peter Carpenter said the Treasury Department would be putting £50-80m into enhanced money market funds over the medium term and expected a rise in returns of 15 basis points up to a total of 60 basis points.

Councillor PJ Murphy, referring to paragraph 5.17 of the report concerning Housing Revenue Account self-financing, asked when a policy on the charging of interest would be agreed. Peter Carpenter said Treasury needed to investigate this issue and consider an overall borrowing policy – he expected this to be done by September.

Councillor Nicolas Botterill, noted that 5.21 of the report stated that any financial instrument held with a non-UK bank was limited to £50m. He asked if this had changed recently because following the financial crisis of 2008-2009 this limit was lowered considerably. Peter Carpenter said the limit had been raised in the past year. He reassured the Committee that the Council followed Government Treasury Advisors Guidance and only used the most trusted institutions.

RESOLVED

That the Committee noted the report.

7. UPDATE ON HEALTH AND SAFETY CHECKS

Jane Martin, Interim Director for Property Services, and Chris Culleton, Principal Compliance Manager, attended to present the update report and provide a verbal update on the Council's response to the Grenfell Tower fire.

Jane Martin reported that all of the recommendations from the original internal audit report had now been completed (detailed in 4.1 of the report). The committee had requested further independent review of Mitie's remaining 591 EICR test reports not covered by the original sample review but due to staff resource issues this had not been commissioned and would not be available for review and comment until the September meeting.

Housing Property Services had appointed additional staff to support the existing teams and strengthen health and safety compliance and a new compliance database was being introduced at the end of July.

Jane Martin informed the committee that a new Fire Safety Strategy had been written and, with the appointment of consultant fire specialist Graham Coupar, Housing Property Services had embarked on an immediate targeted programme of service evaluation and improvements to ensure H&F was in a better position to deal with existing and future fire investigations, meet its responsibilities under the fire safety regulations, and further develop the borough's strategic approach to fire safety and risk management.

Following the fire at Grenfell Tower, officers and MITIE technicians had checked all blocks of six stories and above. A block of 12 stories and above is classified as a 'tower' and there were 14 in the borough. Three towers on the Edward Woods Estate were cladded, and while residents were understandably concerned, officers assured the committee that the panelling was a stone wall product and not comparable to the flammable cladding on Grenfell Tower. The fire brigade had visited the towers and tested the fitting of the panelling and had no immediate concerns. Officers were listening to residents' concerns and holding advice surgeries.

Councillor Nicholas Botterill asked if there was a reason all the relevant fire risk assessments were not publicly available on the Council's website. Chris Culleton said historically the Council had not published them but officers were intending to going forward. Councillors supported this and felt it was good practice to do so.

Councillor Guy Vincent asked what comfort the Council could provide to residents in tower blocks. Would sprinklers be installed for example? Jane Martin said officers were putting together cost proposals for the installation of sprinklers (in individual properties and common areas) on blocks six stories and above. The proposals would be completed by 14 July.

Councillor Guy Vincent asked if there would be funding available from Central Government for the installation of sprinklers and other fire safety improvements. Officers said it would be welcome but felt it was unlikely.

Councillor Mark Loveday noted that the committee had previously been told the programme of electrical safety testing would be completed by 2019 – he felt that was not a tenable position anymore. He asked officers how quickly the remaining electrical testing could be completed. Chris Culleton said they were reviewing this and would take away the committees call for urgency. Councillor Loveday added that the committee had previously been told that the programme would be partly suspended to move resources to the most severe CAT1 level testing – but

resource was no longer a priority. The relatively small sums of money involved should not be a barrier to completing safety testing.

Councillor Guy Vincent said the electrical testing programme was a rolling programme so it wasn't a question of properties not having certificates at all, just that some were older than others. Councillor Mark Loveday said minimum compliance was no longer a defendable position – the Council should make sure they were up to date on all testing.

Kim Dero, Interim Chief Executive, informed the committee that, in light of the Grenfell Tower fire, the administration had made funds available from the capital programme to carry out safety checking, tests and improvements – and the Council would not be satisfied by simply meeting the minimum standards. She added that all areas of health and safety across the organisation were being reviewed.

Councillor Mark Loveday asked if the timescales referred to in paragraph 5.5 of the report were still accurate – that targeted fire risk assessments would start in July 2017 and be completed by December 2017. Kim Dero responded that officers had already started doing the work and a number of assessments had been completed this week. The Council had some globally recognised specialists on contract and was building capacity within the organisation with the support of the Fire Brigade's Borough Commander. She said she would come back to the committee with a completion date for the entire programme shortly.

Councillor Donald Johnson noted that prior to the fire, residents at Grenfell Tower had made complaints about power surges – he asked if it was known if any blocks in the borough had experienced similar issues. Jane Martin said she was not aware of any but a thorough review of complaints was being undertaken to ensure issues had been addressed.

Councillor Donald Johnson also noted that another issue at Grenfell was the number of contractors and sub-contractors. He asked what due-diligence H&F had done to ensure third party contractors weren't sub-contracting out to lower quality providers. Chris Culleton said officers were reviewing everything – all sub-contractors and contractual relationships. Kim Dero added that officers had established a compliance action plan and met every week to discuss these issues.

Councillor Nicholas Botterill said Councils had to come up with an allencompassing approach to safety management that could accommodate the complex arrangements of different organisations, contractors and sub-contracts. He made a comparison to the airline industry that had successfully achieved this and produced huge safety benefits at the same time. Kim Dero agreed and noted that too often the public sector delegated safety and compliance down. H&F would be putting far more robust arrangements in place with the support of a significant capital programme agreed by the administration. H&F wanted residents to get a clear message from the Council that their safety was of the upmost importance. She added that the senior management team would be taking greater responsibility for safety and she would return to the committee with an improvement plan detailing the new approach.

Councillor Michael Adam noted that a lot of the justifiable anger over Grenfell stemmed from the fact that residents had flagged up safety issues over a number of years. Any new safety strategy must be outward looking and reflect the concerns of residents.

Councillor Nicholas Botterill gave an example of a resident who had raised safety issues that had still not been resolved. Kim Dero said officers had gone back to the InTouch team to look at all fire safety related complaints from the last two years, as well as tenant meeting minutes and notes, to ensure any issues raised had been dealt with.

RESOLVED

That the Committee noted the contents of the report and the actions taken to date by officers.

8. <u>CORPORATE ANTI-FRAUD SERVICE END OF YEAR REPORT 2016-17</u>

Andrew Hyatt, Head of Fraud, presented the report on fraud related activity undertaken by the Corporate Anti-Fraud Service between 1 April 2016 and 31 March 2017. He noted that case summary one in appendix one of the report should have stated that the employee in question was a member of staff at a local school and was dismissed following the outcome of the investigation.

Councillor PJ Murphy, referring to 1.4 of the report, noted that proceeds of crime cases awarded a total of £662,073 to the Council but only £310,551 had been recovered. He asked if there was a business case there to have more staff to enable to service to recover more of this money. In response, Andrew Hyatt said the majority of the money awarded was compensation for losses the Council had incurred through fraud which had been recovered through the investigations. Having more staff was not guaranteed to increase the amount of money recovered but the team was looking at other improvements - such as hiring an additional financial investigator and bringing in a housing specialist to investigate illegal subletting.

Councillor Guy Vincent noted that the amount of proven fraud in the borough was increasing (table 1.5 of the report) and asked whether there genuinely were more incidents of fraud or if the Council was simply getting better at detection. Andrew Hyatt said the overall level of fraud seemed to be the same but the team had more resources this year and that had improved output. For example; Right to Buy was an area of growth because the team had become a part of the applications process – allowing them to vet and challenge applicants.

Councillor Ben Coleman asked if the team should take on more staff to increase output further. Andrew Hyatt said the team was currently carrying some vacancies, as they were finding it hard to recruit experienced investigators. He was looking to bring the team up to full complement first then looking at what could be achieved with a larger team. It was also noted that the fraud values, other than proceeds of crime figures, in the report were notional values used for benchmarking, such as the previous Audit Commission's assessment of the impact of subletting – the team was working on determining actual cashable values to more accurately represent the position in the borough.

Councillor Vivienne Lukey, referring to 4.3 of the report, asked how the team was enhancing the culture of fraud identification and prevention within the Council. Andrew Hyatt said the team wanted to be more proactive in this area and would be going into departments to do classroom-based fraud awareness training for staff to help them recognise and report suspected fraud to the team.

Councillor Michael Adam, asked how much money had been recovered from business rates relief for vacant properties fraud. Andrew Hyatt said he would provide that information after the meeting.

ACTION: Andrew Hyatt

Councillor Michael Adam noted that the Council seemed to have detected very few illegal sub-lets in the borough – despite the issue being endemic in central London. Andrew Hyatt responded that it was a major issue in the borough and one of the services major risk areas. He said the problem with detection was that all of the most obvious cases had been investigated, leaving the more difficult cases where tenants were complicit in the fraud and perpetrators were far better at disguising their fraud. The team was trying to use data to better focus resources. An added layer of difficulty in these cases was that the team had to run two sets of legislation in parallel – civil and criminal cases – which slowed the process. Andrew said he was aiming to have more officers focused on tenancy fraud in the near-future.

Councillor Michael Adam asked what ability the Council had to source data on who was actually living in flats vs who was registered at the address. Andrew Hyatt said his team used credit reference agency data National Fraud Initiative data collated by the Cabinet Office data primarily but that was only useful as intelligence, it wasn't admissible in court or sufficient by itself to prove fraud. Officers needed to obtain hard evidence, often by visiting residences unannounced outside of office hours.

Councillor Nicholas Botterill asked if the observations of other residents were used to identify properties where illegal sub-letting was taking place. He added that one of the residents in his ward had phoned the Council on a number of occasions to discuss one of their neighbours but felt they were not taken seriously. Andrew Hyatt said his team did take any information from residents very seriously and they did follow those leads up. Evidence like this was often used in civil cases – but in criminal cases residents would have to make a statement and appear in court which some were reluctant to do. Councillor Botterill asked that officers gave residents who did supply leads with a formal response letting them know that the issues raised were being investigated and that the Council appreciated their help.

Councillor Nicholas Botterill asked how the service put a value on things like Blue Badge fraud. Andrew Hyatt said in that area they relied on old data from the National Fraud Authority (closed by the Government in 2014) as they carried out the last full assessment of how much fraudulent Blue Badges were being used. Since then a lot had changed – there had been cases of Uber drivers using them for example – and he expected the figure would be lower today. Councillor Botterill felt that there was a danger of missing the full impact of some fraud by simply assigning a monetary value.

Councillor PJ Murphy, returned to the point about the team finding it difficult to recruit new staff. He asked for some background on why that was (skills shortage, pay etc.). Andrew Hyatt explained that the primary reasons went back to May 2015 when the Department for Work and Pensions transferred across a significant number of local government officers who had investigated benefit fraud. The relatively attractive work environment and benefits in the civil service made it difficult to hire them back into local government. However, the service had been running a successful apprenticeship scheme and was reviewing the role requirements to ensure that highly motivated staff could be recruited to take on the challenge of tackling fraud in the borough.

NOTE: Councillor Mark Loveday entered the meeting at 7.39pm

Councillor PJ Murphy supported that approach and said the team should look at their person specification to ensure it was as attractive as possible to the widest range of applicants – including those returning to work.

Councillor Donald Johnson asked whether the level of employee fraud was comparable to other authorities. Andrew Hyatt said it was around the same as any other authority. There were a higher number of employees that lived in the borough as compared with many London councils so it was fractionally more likely that they would be involved in tenancy fraud.

RESOLVED

That the committee noted the report.

9. INTERNAL AUDIT QUARTERLY REPORT

Geoff Drake, Senior Audit Manager, presented the report that summarised internal audit activity between 1 January to 31 March 2017. He noted that there had been a total of 19 audit reports finalised in the period, three of which were limited assurance reports.

Outstanding Recommendations – Children's Services

Dave McNamara, Director of Finance and Resources in Children's Services, attended for the outstanding recommendations that related to Children's Services. He informed the committee that recommendations 6 and 9 (Old Oak Primary and Vanessa Nursery) were attributable to a failure of process within Children's Services to pick up the outstanding recommendations and contact schools so they could resolve them. He had now confirmed with the schools that the recommendations had been implemented.

Councillor Donald Johnson asked if there was a communication problem between schools and the Council. Dave McNamara said in this case there was a simple failure to communicate between his officers and schools. Internal communications had been tightened to ensure this didn't happen again. He added that in general his team had a very good working relationship with schools in the borough.

Dave McNamara reported that regarding recommendations 7 and 8 (Information Security), the survey was across the three shared-services areas and only three

schools in the borough responded – though headteachers said that most issues were reflected in the responses. Links had been made with 3BM and the Council's information manager and they were arranging an education programme for schools, starting in September, on data sharing and retention to ensure they had the correct processes in place.

Outstanding Recommendations - Adult Social Care

Mike Boyle, Director for Strategic Commissioning and Enterprise in Adult Social Care, attended to take questions on the outstanding recommendations for Adult Social Care and tabled an updated version of the recommendations current status. He apologised for the initial incomplete response presented in the published papers for the meeting.

Councillor PJ Murphy said he preferred the first version of the report because it seemed more honest. He felt the updated version was filled with jargon but ultimately had the same content – that the requisite training had not been done. He asked officers to use plain English in future. Mike Boyle said because of a capacity issue within the service it was not the best way to get practitioners trained. Now a joint-programme had been put in place with the CCG and it would be cascaded out between September and October.

Councillor PJ Murphy questioned whether there was also a planning issue there – if services make changes they needed to build in the time to train staff. That should have been built in when the policy was agreed. Mike Boyle said that was a fair criticism but the most important issue going forward was ensuring that as new people joined the organisations they could access the right training at the right time.

RESOLVED

That the Committee noted the report.

10. FINAL INTERNAL AUDIT REPORT - ST THOMAS OF CANTERBURY 2016-17

The Chair informed the Committee that the school's Headteacher and Chair of Governors had been invited to the meeting but were unable to attend due to prior engagements. They had requested that the item be deferred to the September meeting and the committee subsequently agreed.

ACTION: David Abbott

Councillor Vivienne Lukey asked when the school was scheduled to be inspected by Ofsted as there were some issues in the report that would likely be interesting to inspectors. Dave McNamara said he could provide that information after the meeting.

11. FINAL AUDIT REPORT - SERVICE CHARGES 2016-17

Geoff Drake, Senior Audit Manager, presented the report and noted that because the issues found by the audit that made this a limited assurance report related solely to BT Managed Services the Chair agreed that the lead officers were not required to attend the committee. Councillor Mark Loveday had three questions that he asked to be sent to the relevant officers for a response:

- 1. Was the Council using the latest guidance (TECH 03/11) from the ICAEW? This guidance was on accounting and reporting in relation to service charge accounts for residential properties on which variable service charges are paid in accordance with a lease or tenancy agreement.
- 2. Was billing major works separately to regular service charges within the terms of the lease? In the past there had been arguments made that any costs should be recovered from the normal service charge.
- 3. The report stated that 40 percent of service charge receipts were initially miss-posted. He asked for an update on the current position.

ACTIONS: Geoff Drake

12. <u>ANNUAL GOVERNANCE STATEMENT ACTION PLAN AND OUTSTANDING</u> <u>RECOMMENDATIONS FOR EXTERNAL AUDIT</u>

Geoff Drake, Senior Audit Manager, presented the report which summarised progress on implementing recommendations arising from the External Audit Report 2015/16 and the Annual Governance Statement.

RESOLVED

That the committee noted the contents of the report.

13. HEAD OF INTERNAL AUDIT ANNUAL REPORT 2016-17

Geoff Drake, Senior Audit Manager, presented the report that provided a summary of all audit work undertaken during the 2016/17 financial year and provided assurances on the overall System of Internal Control, the System of Internal Financial Control, Corporate Governance and Risk Management. The 2016-17 year opinion stated that internal audit could provide reasonable assurance that the system of internal control in place at Hammersmith & Fulham Council for the year ended 31 March 2017 generally accorded with proper practice with the exception of the entries listed at section 8 of the report. This section listed the limited assurance audit reports issued plus the details of the significant control weaknesses included in the draft Annual Governance Statement for the year to March 2017.

Councillor PJ Murphy said it would be helpful for members of the committee if, in future, the assurance levels table in Appendix 1 had an end column that gave a number of recommendations still outstanding.

Councillor Michael Adam noted that Pensions Sub-Committee had discussed issues related to the problems with the transfer of data between Capita and Surrey County Council and asked why there hadn't been an audit of an area of know weakness. Geoff Drake responded that internal audit was aware of the problems and felt an audit would simply surface problems that the Council was already aware of. There would however be an audit of pensions regulations compliance and the current data transfer from payroll should be addressed as part of that audit.

Minutes are subject to confirmation at the next meeting as a correct record of the proceedings and any amendments arising will be recorded in the minutes of that subsequent meeting.

Councillor Guy Vincent asked if the Council's audit function had the resources necessary to be effective and what the committee could do to support it. Geoff Drake said he appreciated the support given by the committee. He added that now David Hughes, the new Director of Audit, Fraud, Risk and Insurance, was in post he would be reviewing processes and reporting back on potential improvements shortly.

RESOLVED

That the committee noted the contents of this report.

14. INTERNAL AUDIT CHARTER 2017

Geoff Drake presented the updated version of the charter and strategy following a 2017 year review.

RESOLVED

That the committee noted the report.

15. RISK MANAGEMENT UPDATE

Mike Sloniowski, Risk Manager, presented the report that provided an oversight of the Council's processes to identify and manage its significant corporate business risks. He acknowledged that recent months had seen a number of dramatic and tragic events – the Grenfell Tower Fire, terrorist attacks in London and Manchester, the NHS ransomware cyber-attack, and a snap-election – and noted that corporate risks were being reassessed as well as the Council's business resilience and continuity arrangements in view of them.

Councillor Michael Adam noted that the Royal Borough of Kensington and Chelsea Council was, until last week, widely considered to be a well-run and efficient organisation but their response to a major civil emergency was clearly lacking. He asked what officers were doing to understand what went wrong in Kensington and check their processes against our own. Mike Sloniowski said they were looking at lessons learned and following recent events were looking to use new processes to ensure the Council had a dynamic and agile continuity response. David Hughes said the team would be look closely at emergency planning and business continuity arrangements in the event of major incident.

Councillor PJ Murphy noted that Hammersmith and Fulham Council was historically closely linked with RBKC through the shared services arrangements and asked if our response to a similar incident would have been different. Mike Sloniowski said that Hammersmith and Fulham had a sovereign emergency planning and business continuity function, with its own response plan and the Emergency Planning Service would be assessing the lessons from Kensington and Chelsea's response.

Councillor Vivienne Lukey noted that she was working for Westminster City Council at the time of the 7/7 bombings and the legacy of that event was a set of clear government guidelines on emergency response – but they didn't seem to be used in relation to Grenfell. Mike Sloniowski said officers in the Council's

Emergency Services and Business Continuity Teams did look at the latest guidance from the Government as well as best practice from business and other local authorities.

Councillor Guy Vincent, referring to Appendix 1 on the exempt agenda, asked if a financial value could be determined for the risks presented. Mike Sloniowski said values could be attached to help articulate the severity of those risks – but advised that some departments were very risk-averse and some of those risks were likely to be moderated down. Training would be given to staff to help them more accurately assess the level of certain risks.

Councillor Nicholas Botterill, noted the high degree of risks associated with the new ICT service and asked if it was not achieving the desired outcomes. Mike Sloniowski advised that at the start of projects officers tended to mark risks as fairly high because there were so many unknowns – but he expected them to come down over time as the new team settled in.

Councillor Mark Loveday observed that the collapse of the Tri-Borough arrangements had been announced before these risks were collated but none of the Directors had identified it as an organisational risk. Mike Sloniowski said it was on the corporate risk register but he would follow up with Directors. Councillor Loveday felt the registers may not have been as thoroughly refreshed as they should have been and asked officers to look again at them. Councillor PJ Murphy said there should be a more generic risk about the failure of key suppliers in the register.

ACTIONS: Mike Sloniowski

Councillor Guy Vincent asked what the process was for challenging risks submitted by Directors. Mike Sloniowski said they should be reviewed and discussed within service management teams. He added that he would be going through service risk registers in depth with officers to get assurances they are up to date and of a high quality.

The Chair asked if all departments were now taking risk as seriously as they should. Mike Sloniowski said risk management was very much seen as a top priority for services.

Councillor Nicholas Botterill noted that the risks presented seemed to be reactive – they were all known quantities - but events like the Grenfell Tower fire showed that officers needed to look at where the gaps in their thinking could be. David Hughes said he would be reviewing the current risk identification process and report back to the committee about what improvements would be made to ensure all areas of risk were considered.

Councillor Vivienne Lukey said she hoped the Council would also be looking at how departments can work together and take a more strategic view. Kim Dero reassured the committee that since being appointed as Chief Executive she had taken a more hands-on approach to risk management – discussing risk and business continuity at regular senior leadership team meetings and holding service resilience team meetings. She said she would raise the issue of how often risks were refreshed with Directors and ensure there was robust challenge of the registers at senior management level.

ACTION: Kim Dero

Councillor Mark Loveday noted that a report on the risks of the disaggregation of shared services was expected but was not on the agenda. Officers said the report would be coming to the September meeting.

Councillor PJ Murphy asked if the Council needed to get in an external consultant to look at risk in the organisation from a new perspective. Kim Dero replied that the Council had recently hired David Hughes as the new Director for Audit, Fraud, Risk and Insurance and she was confident that he would bring fresh ideas and expertise to the organisation. Councillor Michael Adam said external advice on crisis communications could be very useful as it was an area the public sector was not generally very good at. Mike Sloniowski said he would take that away and evaluate that suggestion as part of the review of audit and risk processes and procedures.

RESOLVED

That the Committee noted the report.

16. DATE OF NEXT MEETING

The next meeting was scheduled for 20 September 2017.

17. EXCLUSION OF PUBLIC AND PRESS

RESOLVED

That under Section 100A(4) of the Local Government Act 1972, that the public and press be excluded from the meeting during the consideration of the following items of business, on the grounds that they contain the likely disclosure of exempt information, as defined in paragraph 3 of Schedule 12A of the said Act, and that the public interest in maintaining the exemption currently outweighs the public interest in disclosing the information.

18. <u>RISK MANAGEMENT UPDATE - EXEMPT ELEMENTS</u>

Discussion of this item can be found under Item 15.

Meeting started: 7.00 pm Meeting ended: 9.45 pm

Chair

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