

Y PWYLLGOR ANSAWDD, DIOGELWCH A PHROFIAD QUALITY, SAFETY AND EXPERIENCE COMMITTEE

DYDDIAD Y CYFARFOD: DATE OF MEETING:	14 December 2022
TEITL YR ADRODDIAD: TITLE OF REPORT:	Corporate Risks Assigned to the Quality, Safety and Experience Committee (QSEC)
CYFARWYDDWR ARWEINIOL: LEAD DIRECTOR:	Andrew Carruthers, Director of Operations Phil Kloer, Medical Director Alison Shakeshaft, Director of Therapies and Health Science
SWYDDOG ADRODD: REPORTING OFFICER:	Joanne Wilson, Board Secretary Charlotte Beare, Assistant Director of Assurance and Risk

Pwrpas yr Adroddiad (dewiswch fel yn addas)

Purpose of the Report (select as appropriate)

Er Sicrwydd/For Assurance

ADRODDIAD SCAA

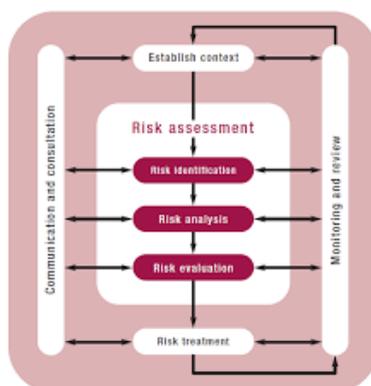
SBAR REPORT

Sefyllfa / Situation

The Quality, Safety and Experience Committee (QSEC) is asked to request assurance from Executive Directors that the corporate risks in the attached report are being managed effectively.

Cefndir / Background

Effective risk management requires a 'monitoring and review' structure to be in place to ensure that risks are effectively identified and assessed, and that appropriate controls and responses are in place.



(Risk Management Process, ISO 31000)

The Board's Committees are responsible for the monitoring and scrutiny of corporate level risks within their remit. They are responsible for:

- Seeking assurance on the management of risks on the Corporate Risk Register (CRR) and providing assurance to the Board that risks are being managed effectively and report areas of significant concern, for example, where risk appetite is exceeded, lack of action, etc.
- Reviewing principal and operational risks over tolerance and, where appropriate, recommend the 'acceptance' of risks that cannot be brought within Hywel Dda University Health Board's (HDdUHB) risk appetite/tolerance to the Board.
- Provide annual reports to Audit and Risk Assurance Committee (ARAC) on the effectiveness of the risk management process and management of risks within its remit.
- Identify through discussions any new/emerging risks and ensure these are assessed by management.
- Signpost any risks outside of its remit to the appropriate HDdUHB Committee.
- Use risk registers to inform meeting agendas.

These risks have been identified by individual Directors via a top-down and bottom-up approach and are either:

- Associated with the delivery our annual plan; or
- Significant operational risks escalated that are of significant concern and require corporate oversight and management.

Each risk on the CRR has been mapped to a Board level Committee to ensure that risks on the CRR are being managed appropriately, taking into account the gaps, planned actions and agreed tolerances, and to provide assurance to the Board through their update report on the management of these risks.

The Board has delegated a proportion of its role of scrutiny of assurances to its Committees to make the most appropriate and efficient use of expertise. Therefore, Committees should also ensure that assurance reports relevant to the principal risks are received and scrutinised, and an assessment made as to the level of assurance it provides, taking into account the validity and reliability i.e. source, timeliness, methodology behind its generation and its compatibility with other assurances. This will enable the Board to place greater reliance on assurances, if they are confident that they have been robustly scrutinised by one of its Committees; and provide them with greater confidence regarding the likely achievement of strategic objectives, as well as providing a sound basis for decision-making. It is the role of Committees to challenge where assurances in respect of any component are missing or inadequate. Any gaps should be escalated to the Board.

The process for risk reporting and monitoring within the UHB is outlined at Appendix 1.

Asesiad / Assessment

The QSEC Terms of Reference reflect the Committee's role in providing assurance to the Board that principal risks are being managed effectively by the risk owners (Executive Leads).

The Terms of Reference state that:

- 3.2 Seek assurance on the management of principal risks within the Board Assurance Framework (BAF) and Corporate Risk Register (CRR) allocated to the Committee and provide assurance to the Board that risks are being managed effectively and report any areas of significant concern e.g. where risk tolerance is exceeded, lack of timely action.

- 3.3 Recommend acceptance of risks that cannot be brought within the UHBs risk appetite/tolerance to the Board through the Committee Update Report.
- 3.4 Receive assurance through Sub-Committee Update Reports that risks relating to their areas are being effectively managed across the whole of the Health Board’s activities (including for hosted services and through partnerships and Joint Committees as appropriate).

There are 9 risks currently aligned to QSEC (out of the 18 that are currently on the CRR) as the potential impacts of the risks relate to the safety of patients, quality of services and patient outcomes. A summary of corporate risks can be found at Appendix 2.

Each of these risks have been entered onto a ‘risk on a page’ template, which includes information relating to the strategic objective, controls, assurances, performance indicators and action plans to address any gaps in controls and assurances. These can be found at Appendix 3.

Changes since the previous report to QSEC (August 2022):

The Committee is requested to seek assurance from risk owners (Executive Directors) that each risk is being managed effectively and will be brought within the UHB tolerance.

Below is a summary of changes since the previous report to QSEC:

Total number of risks	9	
New risks being reported	2	<i>See note 1</i>
De-escalated/Closed risks	0	
Increase in risk score ↑	0	
Reduction in risk score ↓	2	<i>See note 2</i>
No change in risk score →	5	<i>See note 3</i>

The ‘heat map’ below includes the risks currently aligned to QSEC:

HYWEL DDA RISK HEAT MAP					
	LIKELIHOOD →				
IMPACT ↓	RARE 1	UNLIKELY 2	POSSIBLE 3	LIKELY 4	ALMOST CERTAIN 5
CATASTROPHIC 5					1027 (→)
MAJOR 4		1337 (↓)	684 (↓), 1439 (NEW)	129(→), 1340, (→)	1032 (→), 1349 (→) 1548 (NEW)
MODERATE 3					
MINOR 2					
NEGLIGIBLE 1					

Note 1- New risks being reported

Since the previous report, 2 new risks has been added to the Corporate Risk Register.

Risk Reference & Title	Lead Director	Current risk score	Date of Entry	Rationale for Current Risk Score (Extracted from Datix)
1548 - Risk to the Health Board maintaining service provision due to proposed industrial action	Director of Therapies and Health Science	5x4=20	07/12/22	The Executive Risk Group approved this risk on the 7 th December 2022. A further risk will be assessed in relation to the impact of industrial action at partner agencies and other NHS organisations. The Royal College of Nursing (RCN) announced on 9 November 2022 the ballot results confirming their members have voted in favour of industrial action - the first of which have been confirmed for 15 and 20 December 2022. Ballot results have also been received from Unison and GMB. Results are still expected from Unite & Chartered Society of Physiotherapy (CSP) unions also. The potential for significant numbers of staff taking action simultaneously for maximum impact could be exacerbated by staff concerned about crossing picket lines. The risk has been scored on the probability of industrial action rather than the frequency, as this is yet unclear.
1439 - Risk of delays of specialist wound management advice resulting in deep tissue damage, vascular disorders and sepsis	Director of Operations	3x4=12	02/12/22	Due to recent appointments within the TVN service, along with continued recruitment and the introduction of systems such as Attend Anywhere, the risk has been reduced from 16 to 12.

Note 2 - Reduction in risk score

The following risks have reduced their current risk score since the previous meeting

Risk Reference & Title	Executive Director	Previous Risk Score (Aug-22)	Current Risk Score	Date of Review	Update (Extracted from Datix)
684 - Lack of agreed replacement programme for radiology equipment across UHB	Director of Operations	4x4=16	3x4=12	18/11/22	The UHB's stock of imaging equipment routinely breaks down causing disruption to diagnostic imaging services across all sites which has a significant impact on the UHB's ability to meet its Referral to Treatment Time (RTT) target and impact to patients can include delays in diagnosis and treatment. CT and MR scanners have been replaced, and has reduced the frequency of machine downtime compared to previous experience. The CT scanner in Bronglais Hospital (BGH) is due to be upgraded by the end of financial year 2022/23. Prince Philip Hospital (PPH) MRI scanner is due to be included in the next batch of upgrades, pending financial support for 2023/24. The risk score has been reduced to 12 in November 2022 reflecting that some equipment has been installed and is operational. A costed plan along with a rolling programme for the installation of additional equipment is in place. The next batch of equipment for replacement has been prioritised and identified, however no funding has

					yet been secured (for financial year 2023/24). A paper was submitted to the September Capital Sub-Committee meeting for information.
1337 - Risk of reputational harm if the health board is found to have not managed the Llwynhendy TB outbreak as well as it could have	Medical Director	3x4=12	2x4=8	30/11/22	The final report from the External Review Team is expected on the 2 nd December 2022. This has followed feedback from Public Health Wales and the UHB on the initial draft report. The paper will then be presented at the Public Board in January 2023. An action plan in relation to each recommendation will be formulated and, where required, additional resource will be described and considered against the current risks identified.

Note 3 - No change in risk score

There have been no changes to any risk scores since they were reported at the previous meeting.

Risk Reference & Title	Executive Director	Previous Risk Score (Jun-22)	Current Risk Score	Date of Review	Update (Extracted from Datix)
1027 - Delivery of integrated community and acute unscheduled care services	Director of Operations	5x5=25	5x5=25	02/12/22	Levels of emergency demand continue to increase significantly. This is not related to COVID-19 per se but is driven by post pandemic demand and the broader impacts of COVID -19. Workforce deficits, handover delays, 4 and 12 hour performance and bed occupancy rates are all demonstrating significantly worrying trends. The indirect impact of COVID-19 has resulted in increasing levels of frailty in the community and

					consequent demand on our 'front door'. The situation remains at high levels of risk escalation across our acute sites on a daily basis.
1032 - Timely access to assessment and diagnosis for Mental Health and Learning Disabilities clients	Director of Operations	5x4=20	5x4=20	29/11/22	The service was experiencing significant waiting times as a result of increasing demand levels which are now back to pre-pandemic levels, compounding the backlog due to COVID-19 restrictions. Due to increasing "Did Not Attend" (DNA) rates (c25%), ongoing recruitment challenges and increasing demand there is an impact on the services' ability to see the same volume of service users as they were previously able to. Some posts continue to be funded on fixed term basis which can make staff retention challenging along with having to train new incoming staff.
1349 - Ability to deliver ultrasound services at WGH	Director of Operations	5x4=20	5x4=20	18/11/22	Service failure has already occurred with a likelihood of recurrence due to a lack of trained obstetric sonographers, particularly post March 2022 due to staff retirements. The service remains fragile, however a locum sonographer has been secured on a 6 month contract and commenced in November 2022, and also return of a staff member in December 2022 (subject to completing a return to work preceptorship, and will be working 3 days a week). An additional

					<p>locum will also be commencing in December 2022 for 2 days per week. New Qualified (NQT) Physiotherapy sonographer due to commence in November 2022. There may be a short term rise in waiting list but not to the previous extent experience, and will improve when new staff are embedded in post It is noted that there is an ongoing dispute with the current insourced ultrasound service provider, who ceased to provide services from October 2022, which has increased waiting times. Waiting lists are continued to be monitored and prioritised to ensure that obstetric patients and urgent cases are seen to.</p>
129 - Ability to deliver an Urgent Primary Care Out of Hours Service for Hywel Dda patients	Director of Operations	4x4=16	4x4=16	17/11/22	<p>Fragility of out of hours (OOH) service delivery continues. Rotas continue to be fragile, particularly at weekends and holiday periods. The inability to recruit GPs, caused primarily by an aging workforce, combined with increased demand for face-to-face, longer complex consultations, and increasing pressures in day-to-day primary care which is impacting the ability of GPs to be available for OOH shifts. In addition, some clinicians may preferentially work in other urgent emergency care initiatives such as 111 First or SDEC</p>

					<p>(Same Day Emergency Care), as they are potentially much lighter (a pattern reported by Swansea Bay UHB OOH service). This is exacerbated by the minimal numbers of newly qualified GPs applying or enquiring about OOH working patterns. Any further absence on out of hours provision is likely to rapidly result in further deterioration of the current position. Availability of day time work, potentially leading to less availability of locums available for OOH. The UHB currently has approximately 49 GPs (down from 100, 5 years ago) who regularly work the rotas, and an additional 10-20 who only work bank holidays rotas due to enhanced rates. Advanced Nurse Practitioners (ANP) staff have reduced from 4 to 1 which covers 4 hours over a weekend period (0.1 WTE). It is noted that with upcoming Bank Holidays over Christmas and New Year, and envisaged winter pressures, scoring to be reviewed at next risk review.</p>
1340 - Risk of avoidable harm for HDUHB patients requiring NSTEMI pathway care	Director of Operations	4x4=16	4x4=16	23/11/22	NICE guidelines for Acute Coronary Syndromes (NG185) recommend 'coronary angiography (with follow-on PCI if indicated) within 72 hours (3 days) of 'admission/ presentation' for people with unstable angina or NSTEMI who have an

				<p>intermediate or higher risk of adverse cardiovascular events' (recommendation 1.1.6). In support of this recommendation/target, we aim to 'refer' patients to Morriston Cardiac Centre for angiography within 24 hours of 'admission/presentation' in order to achieve a total pathway target of 72 hours. As a baseline, in 2021 the median time between 'admission/presentation' and 'referral' was 39.5 hours and for the entire pathway ('admission/presentation' to 'angiography') it was 213.5 hours (8.9 days). For context, the 2021 position was a deterioration from that maintained in 2019 where the PPH Treat and Repatriate Service supported a median 'admission/presentation' to 'angiography' wait of 120 hours (5 days) - this service was suspended at the outset of COVID-19 due to PPH site pressures. Although January-October 2022 data demonstrates some improvement, the NSTEMI/ACS pathway continues to fall short of the NICE recommended 72 hours pathway, with median time between 'presentation' and 'referral' at 37 hours and entire pathway duration ('admission/presentation' to 'angiography') at 169 hours (7 days)</p>

Argymhelliad / Recommendation

The Committee is requested to seek assurance that:

- All identified controls are in place and working effectively.
- All planned actions will be implemented within stated timescales and will reduce the risk further and/or mitigate the impact, if the risk materialises.
- Challenge where assurances are inadequate.

This in turn will enable the Committee to provide the necessary assurance to the Board, through its Committee Update Report, that the UHB is managing these risks effectively.

Amcanion: (rhaid cwblhau)

Objectives: (must be completed)

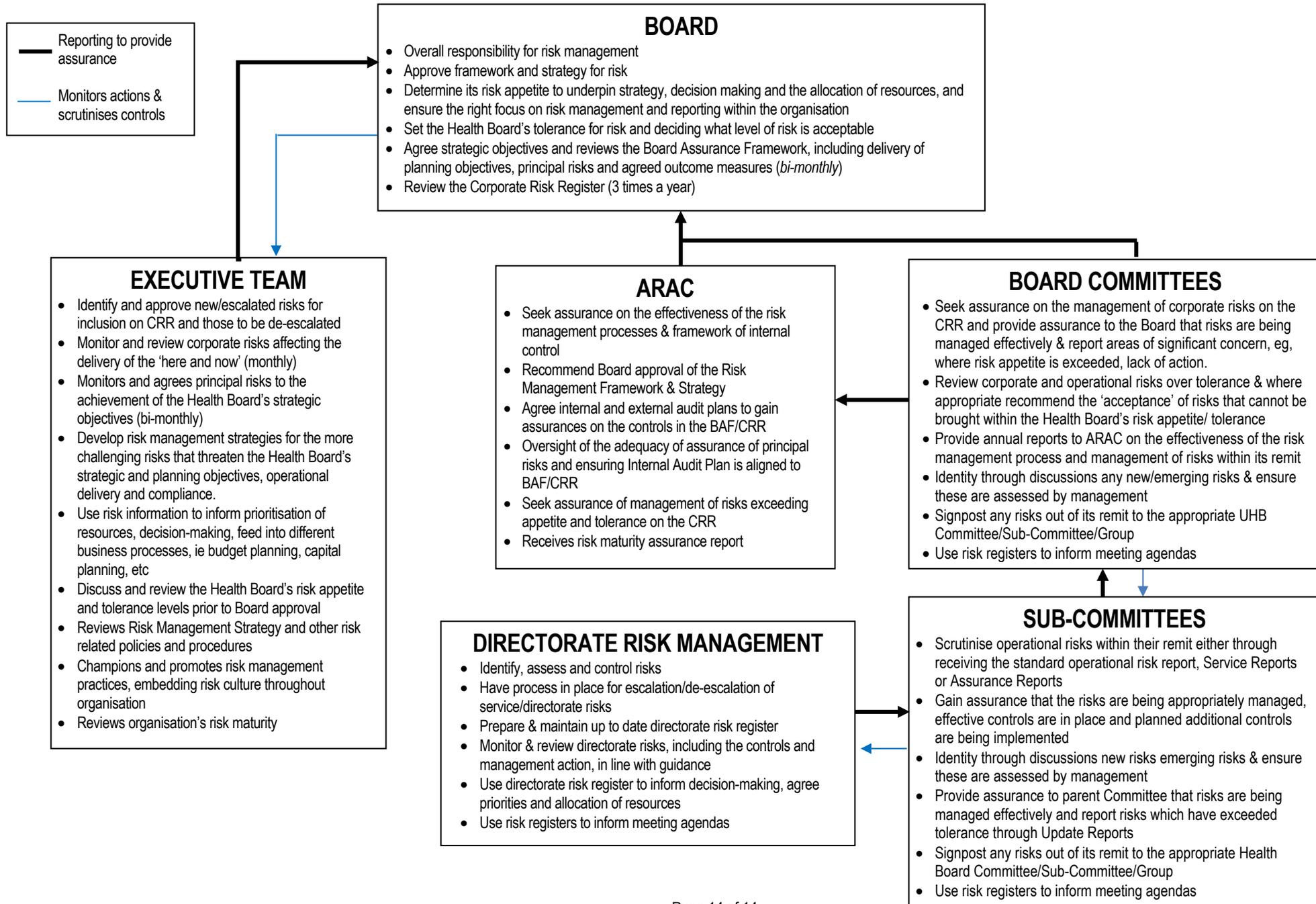
Committee ToR Reference: Cyfeirnod Cylch Gorchwyl y Pwyllgor:	3.2 Seek assurance on the management of principal risks within the Board Assurance Framework (BAF) and Corporate Risk Register (CRR) allocated to the Committee and provide assurance to the Board that risks are being managed effectively and report any areas of significant concern e.g. where risk tolerance is exceeded, lack of timely action. 3.3 Recommend acceptance of risks that cannot be brought within the UHBs risk appetite/tolerance to the Board through the Committee Update Report. 3.4 Receive assurance through Sub-Committee Update Reports that risks relating to their areas are being effectively managed across the whole of the Health Board's activities (including for hosted services and through partnerships and Joint Committees as appropriate).
Cyfeirnod Cofrestr Risg Datix a Sgôr Cyfredol: Datix Risk Register Reference and Score:	Contained within the body of the report
Safon(au) Gofal ac Iechyd: Health and Care Standard(s):	Governance, Leadership and Accountability
Amcanion Strategol y BIP: UHB Strategic Objectives:	All Strategic Objectives are applicable
Amcanion Llesiant BIP: UHB Well-being Objectives: Hyperlink to HDdUHB Well-being Objectives Annual Report 2018-2019	9. All HDdUHB Well-being Objectives apply

Gwybodaeth Ychwanegol: Further Information:	
Ar sail tystiolaeth: Evidence Base:	Underpinning risk on the Datix Risk Module from across the UHB's services reviewed by risk leads/owners
Rhestr Termau: Glossary of Terms:	<p>Current Risk Score - Existing level of risk taking into account controls in place</p> <p>Target Risk Score - The ultimate level of risk that is desired by the organisation when <u>planned</u> controls (or actions) have been implemented</p> <p>Tolerable risk – this is the level of risk that the Board agreed for each domain in September 2018 – Risk Appetite Statement</p>
Partïon / Pwyllgorau â ymgynhorwyd ymlaen llaw y Pwyllgor Ansawdd, Diogelwch a Phrofiod: Parties / Committees consulted prior to Quality, Safety and Experience Committee:	N/A

Effaith: (rhaid cwblhau) Impact: (must be completed)	
Ariannol / Gwerth am Arian: Financial / Service:	No direct impacts from report however impacts of each risk are outlined in risk description.
Ansawdd / Gofal Claf: Quality / Patient Care:	No direct impacts from report however impacts of each risk are outlined in risk description.
Gweithlu: Workforce:	No direct impacts from report however impacts of each risk are outlined in risk description.
Risg: Risk:	No direct impacts from report however organisations are expected to have effective risk management systems in place.
Cyfreithiol: Legal:	No direct impacts from report however proactive risk management including learning from incidents and events contributes towards reducing/eliminating recurrence of risk materialising and mitigates against any possible legal claim with a financial impact.

Enw Da: Reputational:	Poor management of risks can lead to loss of stakeholder confidence. Organisations are expected to have effective risk management systems in place and take steps to reduce/mitigate risks.
Gyfrinachedd: Privacy:	No direct impacts
Cydraddoldeb: Equality:	Has EqIA screening been undertaken? No Has a full EqIA been undertaken? No

Appendix 1 – Committee Reporting Structure



CORPORATE RISK REGISTER SUMMARY DECEMBER 2022

Risk Ref	Risk (for more detail see individual risk entries)	Risk Owner	Domain	Tolerance Level	Previous Risk Score	Risk Score Nov-22	Trend	Target Risk Score	Risk on page no...
1027	Delivery of integrated community and acute unscheduled care services	Carruthers, Andrew	Safety - Patient, Staff or Public	6	5x5=25	5x5=25	→	3x4=12	3
1548	Risk to the Health Board maintaining service provision due to proposed industrial action	Shakeshaft, Alison	Service/Business interruption/disruption	6	N/A	5x4=20	New risk	5x3=15	8
1349	Ability to deliver ultrasound services at WGH	Carruthers, Andrew	Safety - Patient, Staff or Public	6	5x4=20	5x4=20	→	3x4=12	10
1032	Timely access to assessment and diagnosis for Mental Health and Learning Disabilities clients	Carruthers, Andrew	Safety - Patient, Staff or Public	6	5x4=20	5x4=20	→	3x4=12	14
1439	Risk of delays of specialist wound management advice resulting in deep tissue damage, vascular disorders and sepsis	Carruthers, Andrew	Safety - Patient, Staff or Public	6	N/A	4x4=16	New risk	3x3=9	18
129	Ability to deliver an Urgent Primary Care Out of Hours Service for Hywel Dda patients	Carruthers, Andrew	Service/Business interruption/disruption	6	4x4=16	4x4=16	→	3x3=9 Accepted	21
1340	Risk of avoidable harm for HDUHB patients requiring NSTEMI pathway care	Carruthers, Andrew	Safety - Patient, Staff or Public	6	4x4=16	4x4=16	→	1x4=4	25
684	Lack of agreed replacement programme for radiology equipment across UHB	Carruthers, Andrew	Service/Business	6	4x4=16	3x4=12	↓	2x4=8	27
1337	Risk of reputational harm if the health board is found to have not managed the Llwynhendy TB outbreak as well as it could have	Kloer, Dr Philip	Adverse publicity/reputation	8	3x4=12	2x4=8	↓	2x4=8	31

Assurance Key:

3 Lines of Defence (Assurance)		
1st Line	Business Management	Tends to be detailed assurance but lack independence
2nd Line	Corporate Oversight	Less detailed but slightly more independent
3rd Line	Independent Assurance	Often less detail but truly independent

Key - Assurance Required		<i>NB Assurance Map will tell you if you have sufficient sources of assurance not what those sources are telling you</i>
	Detailed review of relevant information	
	Medium level review	
	Cursory or narrow scope of review	

Key - Control RAG rating	
LOW	Significant concerns over the adequacy/effectiveness of the controls in place in proportion to the risks
MEDIUM	Some areas of concern over the adequacy/effectiveness of the controls in place in proportion to the risks
HIGH	Controls in place assessed as adequate/effective and in proportion to the risk
INSUFFICIENT	Insufficient information at present to judge the adequacy/effectiveness of the controls

Date Risk Identified:	Nov-20
Strategic Objective:	5. Safe and sustainable and accessible and kind care

Executive Director Owner:	Carruthers, Andrew	Date of Review:	Dec-22
Lead Committee:	Quality, Safety and Experience Committee	Date of Next Review:	Jan-23

Risk ID:	1027	Principal Risk Description:	<p>There is a risk to the consistent delivery of timely and high quality urgent and emergency care.</p> <p>This is caused by significant fragility across the urgent and emergency care (UEC) system (acute, primary care, community and social care services), related to workforce compromise and increasing levels of demand and acuity. This is not related to COVID-19 per se but is driven by post-pandemic demand and the broader impacts of COVID -19. This could lead to an impact/affect on the quality of care provided to patients, significant clinical deterioration, delays in care and poorer outcomes, increased incidents of a serious nature relating to ambulance handover delays and overcrowding at Emergency Departments and delayed ambulance response to community emergency calls, increasing pressure of adverse publicity/reduction in stakeholder confidence and increased scrutiny from regulators.</p>
Does this risk link to any Directorate (operational) risks?		1406, 1210, 750, 205, 86, 820, 232, 1298, 1281, 906, 1380, 1116, 878, 839, 1167, 1223, 111, 114, 199, 523, 136, 200, 1115, 1078, 572, 1295, 1231, 966, 967, 565, 852, 1295, 1435, 1377, 1083, 180, 1424, 1417, 1309, 291, 118, 925, 119, 1245	

Risk Rating:(Likelihood x Impact)	
Domain:	Safety - Patient, Staff or Public
Inherent Risk Score (L x I):	5x5=25
Current Risk Score (L x I):	5x5=25
Target Risk Score (L x I):	3x4=12
Tolerable Risk:	6

Trend:	↑
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Rationale for CURRENT Risk Score:

Levels of emergency demand continue to increase significantly. This is not related to COVID-19 per se but is driven by post pandemic demand and the broader impacts of COVID -19. Workforce deficits, handover delays, 4 and 12-hour performance and bed occupancy rates are all demonstrating significantly worrying trends. The indirect impact of COVID-19 has resulted in increasing levels of frailty in the community and consequent demand on our 'front door'. The situation remains at high levels of risk escalation across our acute sites on a daily basis.

Rationale for TARGET Risk Score:

There is a significant challenge across the Urgent and Emergency Care system. The combined impact of the multi-faceted pressures which underpin this risk have led to an incremental increase in the overall level of pressure as reflected in deteriorating delays for ambulance handover, access to urgent and emergency care and delayed discharges. The extent to which these combined pressures impact upon the timeliness and quality of care provided is related to the overall availability of staffing resources on a daily / weekly basis, which in turn is influenced by increasing levels of staff sickness/absence.

Key CONTROLS Currently in Place: (The existing controls and processes in place to manage the risk)
<p># Comprehensive daily management systems in place to manage unscheduled care risks on daily basis including multiple daily multi-site calls in times of escalation which include efficient handover from WAST into ED.</p> <p># Reviews of patients admitted to surged areas to ensure patient acuity and dependency is monitored and controlled.</p> <p># Surge beds continue as per escalation and risk assessment of site demand and acuity (where staffing allows). A daily review of the use of surge beds via patient flow meetings to facilitate step down of beds.</p> <p># Discharge lounge takes patients who are being discharged.</p> <p># The staffing position continues to be monitored on a daily basis in accordance with safe staffing principles and specifically reviews COVID-related absence and forward forecast.</p> <p># Regular reviews of long stay patients over 7 days at weekly meetings across all hospital sites.</p> <p># Regular advice on discharge planning and complex care management is provided to ward based staff through Community Discharge Liaison teams, Social services and the Long Term Care Team support.</p> <p># Delivery plans in place supported by daily, weekly and monthly monitoring arrangements.</p> <p># Escalation plans for acute and community hospitals (within limits of staffing availability).</p> <p># Winter Plans developed to manage whole system pressures.</p> <p># Joint workplan with Welsh Ambulance Services NHS Trust.</p> <p># 111 implemented across Hywel Dda.</p> <p># Transformation fund bids in relation to crisis response being implemented across the Health Board.</p> <p># IP&C support for care homes to avoid outbreaks.</p> <p># Ability to deploy Health Board staff where workforce compromise is immediately threatening to continuation of care for residents.</p> <p># Care Home Risk & Escalation Policy to be applied to support failing care homes as required.</p> <p># Domiciliary Care Risk and Escalation Policy approved by Integrated Executive Group and implemented across Health Board</p> <p># COVID-19 IP&C Outbreak policy in place to coordinate management of infection outbreaks, led by site HoNs (supported by IP&C teams).</p>

Gaps in CONTROLS				
Identified Gaps in Controls : (Where one or more of the key controls on which the organisation is relying is not effective, or we do not have evidence that the controls are working)	How and when the Gap in control be addressed	By Who	By When	Progress
<p># Fragility of Care Home Sector exacerbated by COVID related issues such as financial viability, staffing deficits, recruitment and retention of workforce.</p> <p># Significant paucity of domiciliary care/social care availability due to recruitment and retention of staff</p> <p># Nurse staffing availability to ensure safe levels of care as a consequence vacancies.</p> <p># Post-COVID-19 fatigue is exacerbating workforce capacity and availability of bank and agency staff who would be available.</p> <p># COVID-19 incidence continues to further exacerbated workforce capacity and availability of bank and agency staff who would be available.</p> <p># Inability to offload ambulances to release them back for use within community.</p> <p># Increased pressures at ED as a result of WAST ambulance response policy resulting in very poorly patients self-presenting.</p> <p># Better understanding of ED presentations to ensure development of alternative pathways in primary care / community to prevent ED attendance</p> <p># Effective and timely communication to the public at times of pressure but also of safe alternatives to hospital admission / ED presentation that will contribute to changing public mind set</p>	To consider alternative models of medical oversight i.e service level agreement with local GPs and HB salaried community GPs	Dawson, Rhian	Completed	Pending confirmation indemnity for the local GPs to deliver.
	Refer CRR 1406 detailing actions to address insufficient workforce to support delivery of essential services.	Gostling, Lisa	31/03/2023	Ref CRR 1406 for detailed progress.
	Explore service provision in the community for people pending ambulance conveyance, and where conveyance is not possible to manage ambulance handover delays	Dawson, Rhian	Completed	Completed.
	Recruit additional workforce in line with safe staffing requirements for 28 beds in Amman Valley Hospital	Dawson, Rhian	Completed	Completed.
	Development of enhanced Bridging Service and to actively recruit HCSWs to support domiciliary care services	Lorton, Elaine	Completed	Completed.
	Create live UEC performance dashboard.	Dawson, Rhian	Completed	UEC live performance dashboard in place.
	Recruitment to UEC Programme Management Office	Dawson, Rhian	31/01/2022 31/03/2022 30/09/2022	Recruitment process underway.
	Implementation of 111 First and local streaming hub as well as enhancing Same Day Emergency Care (SDEC) provision to reduce conveyance and conversion	Dawson, Rhian	31/03/2023	Recruitment underway. £3.4m awarded by WG for UEC Programme.
	Explore and gain approval for funding for 2wte COTE consultants	Dawson, Rhian	Completed	Completed
	To implement the Standard for Discharge to Assess in accordance with the WG Discharge Guidance	Dawson, Rhian	Completed	Plan to be developed.

Integrated whole system, urgent and emergency care plan agreed.
 # Establishment of a Discharge to Assess (D2A) Group which reports to the Unscheduled Care group.
 # Establishment of a D2A Escalation Transfer panel which provides senior oversight of delays, assesses risk of the delay to the patient and organisation in terms of flow compromise
 # To optimise step down bed capacity in the community across care homes and community hospitals
 # SRO in place to lead agreed Urgent and Emergency Care (UEC) programme
 # Supernumery HCSWs aligned to the acute response teams to support failing community care capacity
 # Support for complex discharge caseload management tool (SharePoint) appointed
 # Reminders issued to management on importance of robust management of staff sickness and the use of COVID-19 Risk Assessment to help manage staff absences.
 # SDEC models continuously reviewed and refined to maximise impact on admission avoidance.
 # Staff are encouraged to participate in the UHB's ongoing COVID-19 vaccination programme.
 # Alternative models of medical oversight i.e service level agreement with local GPs and HB salaried community GPs.
 # Service provision in the community for people pending ambulance conveyance, and where conveyance is not possible to manage ambulance handover delays.
 # Increased bedding capacity in community hospitals.
 # UEC live performance dashboard in place.
 # Local streaming hub.
 # Direct referral into SDEC in WGH, GGH and PPH.
 # Operational joint meeting with WAST to identify and taking forward key action to help address conveyance.
 # Clinical Streaming Hub includes APP Navigator working with Physicians to triage and stream patients pending conveyance to more appropriate pathway in the community (In Hours).

/ expectation and culture in terms of use of NHS resource and 'Home First'
 # Education and training for best practice in frailty management mandated to effect culture of 'unsafe to admit' for our very / severely frail
 # Supporting staff to be able to better manage family dispute relating to expectation eg home of choice, transfer pathways to short term placement in care home pending home care availability
 # Development of a 'tool' that supports staff to assess risk across the whole system to support decision making when discharge appears to be 'risky' to the individual patient. This includes decision making for 'further rehabilitation required in the acute environment' (why not at home?), further blood analysis to confirm medically fit to discharge, home care not available but family happy to take in the interim.
 # For all patients with LOS > 21 days the need for escalation and 'senior think tank'
 # If there is a paucity of home care to the extent that we are unable to provide > 28 hours per week (calls four times per day) - why are we advocating this level of commissioning?
 # Clarity regarding roles and responsibilities for discharge planning and coordination
 # The availability of live data at Cluster, County and Site level with sufficient analytical support
 # the ability to risk stratify for people at moderate to high risk of admission in the community to implement proactive anticipatory care plans to support avoidance of exacerbation / decompensation and hence increased risk of hospital admission
 # Optimising our bedded facilities in the community i.e we should aim for

Review ambulance handover procedure in conjunction with WAST and HB Review Escalation Policy	Passey, Sian	Completed	The Ambulance Hand over policy which has been updated in collaboration with WAST has now been ratified. An updated self - assessment in relation to recommendations received from HIW has been submitted to WAST in October. Partnership working with WAST and other colleagues continues to address hand over delays and this is being taken forward through TUEC work streams
Review Escalation Policy	Jones, Keith	Completed	HB Escalation Policy reaffirmed. Sites regularly operating at Red (Level 4) status with limited non-urgent elective surgery undertaken at the four sites due to urgent and emergency care pressures.
Review nursing models to support increasing capacity and environments for patients	Passey, Sian	Completed	Continuous discussions with Heads of Nursing and regular operational consideration given to scoping patient profile and pathways. In conjunction with primary care colleagues additional capacity in Amman Valley Hospital.
To undertake a quality improvement project to map flow across GGH unscheduled system supported by Improvement Wales.	Perry, Sarah	31/12/2022 31/12/2023	Work has started.
To codesign schemes with Local Authorities that put urgent capacity into the system to reduce bed occupancy rate for frail, complex patients	Lorton, Elaine	31/10/2022 28/02/2023	First meeting scheduled on 18/05/22.
Review extant Escalation Policy to incorporate the whole UEC system	Jones, Keith	31/12/2022	HB Escalation Policy reaffirmed. Sites regularly operating at Red (Level 4) status with limited non-urgent elective surgery undertaken at the four sites due to urgent and emergency care pressures.
Incorporate and deliver actions that will address control gaps into the Health Board's UEC Plan.	Dawson, Rhian	31/03/2025	Launch of the UEC Improvement Programme on 16/06/22 to galvanise a collective approach to improvement.

	<p>'step up' from community and from 'front door' hospitals (within 72 hours) rather than as a 'step down' from acute hospitals after long length of stay. LOS should be no more than 10 days</p> <p># Bespoke recruitment targeted at critical posts that will deliver improvements in UEC eg ANPs, APPs, PAs etc. and accept risk to permanently fund such posts i.e should not be temporarily funded.</p> <p># Frailty screening by staff in ED and reporting into WPAS to support risk stratification of patient cohorts who should spend no more than 10 days in hospital. Majority should be turned around in 12 hours and < 72 hours.</p> <p># Frailty screening and reporting into WPAS of inpatients who either have formal care in place on admission or whose level of frailty on admission suggests a need for care and support on discharge. This will support risk stratification to support discharge planning and coordination.</p> <p># Consideration of workforce development for existing staff but also bespoke opportunities for non clinical roles that releases clinical time for 'clinicians to only do what they can do'</p> <p># Reduce service duplication across sites</p> <p># Development of 24/7 urgent primary care service that integrates urgent primary care service in the day and GPOOH and provides timely information, advice and assistance to patients and clinicians to provide safe alternatives to hospital admissions.</p>	<p>Review wider nursing establishment requirements across 25A wards (outside of NSLA) to support increasing capacity and environments for patients.</p>	<p>Passey, Sian</p>	<p>Completed</p>	<p>Complete - All wards have been reviewed and will continually be reviewed, throughout the nurse staffing cycles and through the workforce stabilisation meetings Chaired by workforce, these meeting include each site and consider all wards and services nurse staffing. Additional capacity has been created in Amman Valley. An Alternative Care Unit Y Lolfa became operational in November on the GGH site, with the focus on complex discharges and prevention of further de-conditioning of patients. There are close working relationships with Home First Teams and other based community teams with the purpose of supporting discharge of complex patients into the community at the earliest opportunity. Review of nursing models within EDs will continue through the nurse stabilisation meetings now established.</p>
	<p>To review the West Wales Care Partnership Regional Discharge 2 Assess policy and develop action plan to ensure effective implementation of Policy Goal 5 (optimal hospital care following admission)</p>	<p>To review the West Wales Care Partnership Regional Discharge 2 Assess policy and develop action plan to ensure effective implementation of Policy Goal 5 (optimal hospital care following admission)</p>	<p>Passey, Sian</p>	<p>Completed</p>	<p>Confirmed as complete by Rhian Matthews on 02/12/2022</p>

ASSURANCE MAP			
Performance Indicators	Sources of ASSURANCE	Type of Assurance	Required Assurance
		(1st, 2nd, 3rd)	Current Level
Performance indicators. A suite of unscheduled care metrics have been developed to measure the system performance.	Medically optimised and ready to transfer patients are reported 3 times daily on situation reports	1st	█
	Daily performance data overseen by service management	1st	█
	Delivery Plans overseen by Unscheduled Care Improvement Programme	2nd	█
	Bi-annual reports to SDOPC on progress on delivery plans and outcomes (and to Board via update report)	2nd	█
	IPAR Performance Report to SDOPC & Board	2nd	█
	WAST IA Report Handover of Care	3rd	█
	11 x Delivery Unit Reviews into Unscheduled Care	3rd	█
	Delivery Unit Report on Complex Discharge	3rd	█

Control RAG Rating (what the assurance is telling you about your controls)
█

Latest Papers (Committee & date)

Gaps in ASSURANCES				
Identified Gaps in Assurance:	How are the Gaps in ASSURANCE will be addressed Further action necessary to address the gaps	By Who	By When	Progress
None identified.				

Date Risk Identified:	Nov-22
Strategic Objective:	5 - Safe, sustainable, accessible and kind care

Executive Director Owner:	Shakeshaft, Alison	Date of Review:	Dec-22
Lead Committee:	Quality, Safety and Experience Committee	Date of Next Review:	Jan-23

Risk ID:	1548	Principal Risk Description:	There is a risk of the Health Board being unable to maintain routine, urgent and emergency service provision across the organisation in the event of industrial action. This is caused by a number of unions balloting members on willingness to participate in strike action. This could lead to an impact/affect on patient care, patient safety, delivery of services and organisational reputation. Additionally this could also impact delivery of the Health Boards delivery plan and financial position.
Does this risk link to any Directorate (operational) risks?			

Risk Rating:(Likelihood x Impact)		No trend information available.	
Domain:	Service/Business interruption/disruption		
Inherent Risk Score (L x I):	5x4=20		
Current Risk Score (L x I):	5x4=20		
Target Risk Score (L x I):	5x3=15		
Tolerable Risk:	6		
Trend:	New risk		

Rationale for CURRENT Risk Score:
The Royal College of Nursing (RCN) announced on 9 November, 2022 the ballot results confirming their members have voted in favour of industrial action - the first of which have been confirmed for 15 and 20 December, 2022. Ballot results have also been received from Unison and GMB. Results are still expected Unite & CSP unions also. The potential for significant numbers of staff taking action simultaneously for maximum impact could be exacerbated by staff concerned about crossing picket lines. The risk has been scored on the probability of industrial action rather than the frequency, as this is yet unclear.

Rationale for TARGET Risk Score:
This will be adjusted as the situation becomes clearer. The impact has been reduced as the controls that will be put in place are aimed to reduce the impact to patient safety and patient care.

Key CONTROLS Currently in Place: (The existing controls and processes in place to manage the risk)
Industrial Action Planning Group formed for planning, developing contingency measures and response arrangements.
Command & Control structures in place as required.
Scoping of staff groups included in planned action completed.
Proactive compilation of critical service areas from a HB perspective (based on Essential Services Guide) completed.
Regular scheduled meetings with Trade Unions in place.
Regular liaison with RCN Strike Committee established.
Process for requesting derogations underway.

Gaps in CONTROLS				
Identified Gaps in Controls : (Where one or more of the key controls on which the organisation is relying is not effective, or we do not have evidence that the controls are working)	How and when the Gap in control be addressed	By Who	By When	Progress
Clarity regarding the intentions of the unions.	Scoping of scale of staff intentions by developing template and key points for service leads to use.	Morgan, Steve	15/12/2022	Mostly completed, few outstanding areas awaited.
Ballot results for Unite, Unison, CSP and GMB awaited.	Scoping of staff groups included in planned action.	Morgan, Steve	Completed	Completed - clarification received from Trade Unions
National structures for planning and response to be confirmed.	Proactive compilation of critical service areas from a HB perspective	Jones, Keith	Completed	Completed
	Commencement of exemption negotiations with trade unions.	Morgan, Steve	Completed	Completed - meetings held with RCN on 17/11/22 & 2/12/22. Further regular scheduled meetings to be utilised to progress negotiations.

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Clarification of position of students on placement and/or bank, during industrial action.	Oliver, Will	12/12/2022	Nurse student position established - students will be on study days and not in placements. All other students to continue as normal unless otherwise advised by University or national steer.
Data capture process to determine impact on service delivery, patient care and financial position.	Morgan, Steve	15/12/2022	In progress utilising Allocate & ESR.
Development of response strategy to cover workforce gaps and protect delivery of critical services.	Shakeshaft, Alison	15/12/2022	Planning Group in place to develop contingencies.
Process for responding to "on the day" derogation requests to be confirmed with IA Planning Group and RCN Strike Committee.	Morgan, Steve	15/12/2022	In progress.
Process for measurement of "harm" to be agreed by IA Planning Group.	Shakeshaft, Alison	15/12/2022	Planning Group to agree process for identification of contingency failure resulting in harm.
Development of communications strategy in response to emerging position.	Hughes-Moakes, Alwena	15/12/2022	Strategy to be developed when national position clearer. Currently national and Welsh NHS

ASSURANCE MAP			
Performance Indicators	Sources of ASSURANCE	Type of Assurance	Required Assurance
		(1st, 2nd, 3rd)	Current Level
	Industrial Action Planning Group Meeting daily	1st	
	Regular updates to Executive Team and OPDP	1st	

Control RAG Rating (what the assurance is telling you about your controls)
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Latest Papers (Committee & date)

Gaps in ASSURANCES				
Identified Gaps in Assurance:	How are the Gaps in ASSURANCE will be addressed Further action necessary to address the gaps	By Who	By When	Progress
Ability to measure impact of industrial action.	Scoping of measurement process for Health Board response to action.	Shakeshaft, Alison	31/12/2022	To be determined

Date Risk Identified:	Feb-22
Strategic Objective:	5. Safe and sustainable and accessible and kind care

Executive Director Owner:	Carruthers, Andrew	Date of Review:	Nov-22
Lead Committee:	Quality, Safety and Experience Committee	Date of Next Review:	Dec-22

Risk ID:	1349	Principal Risk Description:	<p>There is a risk of failing to deliver the ultrasound service at WGH. This is caused by a lack of appropriately trained obstetric staff, with no additional capacity on site to absorb displaced patient slots. The obstetric ultrasound examination unit operating at reduced capacity due to:</p> <ul style="list-style-type: none"> *Lack of robust plan to replace sonographers who have now retired. *National shortage of radiographers within the general area. *Staff working arrangements changing, with several now going part time *Increased obstetric demand - specifically for 3rd trimester scans in line with the WAG targets of reducing still birth rates. *The loss of a general ultrasound scan room due to air exchange fears and the pandemic, therefore further reducing capacity to undertake scans. This could lead to an impact/affect on increasing routine ultrasound waiting lists (which is already breaching 40 weeks in some cases), adverse peri-natal outcomes, failure to provide routine obstetric screening nuchal translucency (NT), and anomaly scans, failure to provide growth scans (the HB is not working in line with Growth Assessment Protocol (GAP) grow guidelines), non-adherence to RCOG and NICE guidelines, increased stress for staff creating a negative working culture, increased risk of staff developing Repetitive Strain Injury (RSI) and reduction in confidence from stakeholders.
Does this risk link to any Directorate (operational) risks?			114, 111, 925, 1223

Risk Rating:(Likelihood x Impact)	
Domain:	Safety - Patient, Staff or Public
Inherent Risk Score (L x I):	5x4=20
Current Risk Score (L x I):	5x4=20
Target Risk Score (L x I):	3x4=12
Tolerable Risk:	6
Trend:	↔

Month	Current Risk Score	Target Risk Score	Tolerance Level
Jun-22	20	12	6
Sep-22	20	12	6
Nov-22	20	12	6

Rationale for CURRENT Risk Score:

Service failure has already occurred with a likelihood of recurrence due to a lack of trained obstetric sonographers, particularly post March 22 due to staff retirements. The service remains fragile, however locum sonographer has been secured on a 6 month contract and commenced in November 2022, and also return of staff member from an extended maternity leave in December 2022 (subject to completing a return to work preceptorship, and will be working 3 days a week). An additional locum (a retire and return to the Health Board) will also be commencing in December 2022 2 days per week. NQT Physiotherapy sonographer due to commence in November 2022. There may be a short term rise in waiting list but not to the previous extent experience, and will improve when new staff are embedded in post

It is noted that there is an ongoing dispute with the current insourced ultrasound service provider, who ceased to provide services from October 2022, which has increased waiting times. Waiting lists are continued to be monitored and prioritised to ensure that obstetric patients and urgent cases are seen to.

Rationale for TARGET Risk Score:

The actions below will not in themselves reduce this risk significantly. Support is required to undertake the demand and capacity and the current establishment reviews. It is likely that these reviews will lead to a need for further investment and additional funding to establish a sustainable service model to include a robust perpetual training programme, that will enable the Health Board to met expected diagnostic waiting times targets.

Key CONTROLS Currently in Place:
(The existing controls and processes in place to manage the risk)

*Continual recruitment campaigns

*Ability to request assistance from other sites when peak staff shortages experienced at WGH

*Review of current workforce issues by senior management, and SBARs drafted for relevant Bronze and Silver

* Met with recruitment to improve advertising of posts.

* Outpatient referrals are being sent to other sites.

* Some weekend working in place during Apr22 where there are gaps in service during the week.

* In addition to the Site Lead Superintendent Radiographer, it has been agreed that sonographers from other sites will provide cover when possible, and a locum for 2 months has been agreed.

* Waiting lists monitored and prioritised

Gaps in CONTROLS				
Identified Gaps in Controls : (Where one or more of the key controls on which the organisation is relying is not effective, or we do not have evidence that the controls are working)	How and when the Gap in control be addressed	By Who	By When	Progress
National shortage of sonographers.	Approach PHW about the possibility of the Health Board failing to provide an obstetric screening service	Lingwood, Gill	Completed	Discussions with obstetrics service have taken place to agree that they will have this discussion with PHW.
Inability to attract people to work in West Wales.	Explore the possibility of sending obstetric patients to other sites.	Lingwood, Gill	Completed	Radiology Staffing Task and Finish Group met on 31/03/22 and it was established that it is not currently practical to send obstetric patients to other sites. In addition to the Site Lead Superintendent Radiographer, sonographers from other sites providing cover, a locum for 2 months has been granted, however the service is still fragile due to sickness and annual leave. Update-Locum will end her contact with us on 31/05/22 due to uncertainty of continued employment as she has to take a six month break due to previously being an employee within the HB. This locum will therefore take her 6 month break from this point which has placed additional pressures on the service
Inability recruit locum sonographers to provide short term respite.				
Ability of other sites to release capacity when required.				
Ceasing in enhanced payments for staff for additional shifts				
Previous control of the insourced company has now ceased due to ongoing legal dispute				
	Train midwives to be able to scan obstetrics	Lingwood, Gill	31/03/2023	It takes a year to complete sonography training in obstetrics and a further year for general ultrasound. Currently we have one midwife training who will qualify in January 2023 and follow a period of preceptorship. We are unable to train any further midwives at Withybush until at least January 2024, however Glangwili may be able to support the training of a midwife sonographer in January 2023 to bolster the service cross site. It is planned that training can commence in September 2023 for a new trainee sonographer.

Convert existing sonographer vacancy to backfill the release of radiographer to train in ultrasound from Jan23	Lingwood, Gill	31/03/2023	Post is at vacancy approval stage on Trac. However it takes a year to complete sonography training.
An update paper to written for OPDP to inform of the plan to sustain services in the short to medium term.	Roberts-Davies, Gail	Completed	Updates to OPDP are ongoing. Initial update paper presented to OPDP on 11th May 2022. Verbal update to be given at OPDP on 25th May and ongoing. Discussion with Head of Radiology confirmed that the initial action has been completed, and ongoing discussions now a control for the risk as it's an ongoing process.
Developing a mini competition document to test the market for insourcing ultrasound company for at least 12 months	Roberts-Davies, Gail	Completed	The mini-competition doc was approved and advertised. The closing date for submissions was 12:00 on 25/05/2022. Unfortunately no companies on the Welsh framework responded. One company on the Crown framework has been engaged via a direct award. A rolling three month programme for insourcing has been approved as at July 2022 and commenced Aug 2022. This is progressing well and early indications are promising. As document has been developed-action closed and added to controls for the risk.
Seek support to undertake a demand and capacity (D&C) review and detailed establishment review of the radiology service.	Roberts-Davies, Gail	30/06/2022 30/11/2022 31/03/2023	Initial contact made with workforce planning team re: establishment review work, and this work is also being supported by the Value Based Health Care team as of November 2022. This has been discussed in the Radiology Use of Resources Meeting and further discussions are taking place in regard to establishing a Radiology Planning and Delivery Group to bring together all pieces of work with the necessary expertise. Work is ongoing with informatics to create a Radiology dashboard, and we are currently reviewing our staffing establishment and structure.

ASSURANCE MAP			
Performance Indicators	Sources of ASSURANCE	Type of Assurance (1st, 2nd, 3rd)	Required Assurance
			Current Level
Non-Obs ultrasound - currently >over 40 weeks	Management review of sonography and SCP diagnostic waiting times	1st	█
	Monthly review of USC performance undertaken monthly (currently 42% of USC breaching), included in the IPAR & reported to WG	1st	█
	IPAR overseen SDODC & Board	2nd	█

Control RAG Rating (what the assurance is telling you about your controls)
█

Latest Papers (Committee & date)
Sonography Report to Acute Bronze and Operation Planning and Delivery Programme meeting

Gaps in ASSURANCES				
Identified Gaps in Assurance:	How are the Gaps in ASSURANCE will be addressed Further action necessary to address the gaps	By Who	By When	Progress

Date Risk Identified:	Nov-20
Strategic Objective:	5. Safe and sustainable and accessible and kind care

Executive Director Owner:	Carruthers, Andrew	Date of Review:	Nov-22
Lead Committee:	Quality, Safety and Experience Committee	Date of Next Review:	Dec-22

Risk ID:	1032	Principal Risk Description:	There is a risk that the length of time MH&LD clients (specifically ASD and psychological services) are waiting for assessment and diagnosis will continue to increase. This is caused by an increase in referrals and increasing DNA rates (c25%). There is also difficulty in recruiting suitably trained staff as well as sustainability of key posts as they are fixed term. This could lead to an impact/affect on increasing delays in accessing appropriate diagnosis and treatment, delayed prevention of deterioration of conditions and delayed adjustments to educational needs.
Does this risk link to any Directorate (operational) risks?			138, 140, 1249, 1286, 1287, 1392

Risk Rating:(Likelihood x Impact)	
Domain:	Safety - Patient, Staff or Public
Inherent Risk Score (L x I):	4x4=16
Current Risk Score (L x I):	5x4=20
Target Risk Score (L x I):	3x4=12
Tolerable Risk:	6
Trend:	↔

Date	Current Risk Score	Target Risk Score	Tolerance Level
Nov-20	16	12	6
Feb-21	16	12	6
Sep-21	16	12	6
Jan-22	20	12	6
Jul-22	20	12	6
Sep-22	20	12	6
Nov-22	20	12	6

Rationale for CURRENT Risk Score:
 The service were experiencing significant waiting times as a result of increasing demand levels which are now back to pre-pandemic levels, compounding the backlog due to Covid restrictions. Due to increasing DNA rates (c25%), ongoing recruitment challenges and increasing demand there is an impact on the services' ability to see the same volume of service users as they were previously able to. Some posts continue to be funded on fixed term basis which can make staff retention challenging along with having to train new incoming staff.

Rationale for TARGET Risk Score:
 The Directorate is prioritising implementation of WPAS in key areas within MHL D and this will enable improved reporting and waiting list management and enable forward trajectories of improvement in waiting times to be determined.

 The target risk score will be dependent on securing recurring funding for the IAS as well as having access to appropriate clinical venues and other agencies being able to undertaken their associated assessments.

Key CONTROLS Currently in Place: (The existing controls and processes in place to manage the risk)
Use of IT/virtual platforms such as AttendAnywhere when appropriate.
Clinical prioritisation regarding assessment and treatment of service users by engaging in a dynamic process of reviewing waiting lists in line with any other referrals that may be received in respect of that service user.
Additional funding provided for recruitment however national shortage of required skills - 3 new staff have been recruited into the ASD team.
Services are in contact with individuals to provide information regarding mainstream/Tier 0 support, wellbeing at home and guidance should their situation deteriorate.
Regular meetings with Women and Children's Service to strengthen interdepartmental working.
Process in place to ensure individuals on waiting lists are being contacted periodically through the wait for assessment/treatment to monitor any alteration in presentation.
Papers have been presented at the Quality Safety and Experience Assurance Committee with a further update paper provided for the December 2021 meeting outlining control measures to manage the waiting times that the Directorate have at present. A paper was presented at Board Seminar in June 2022 to provide assurance on current waiting times and control measures.
Service Delivery Manager appointed and in place.
Continual review of vacancies via MHL D QSE meetings resulting in the consideration of alternative staffing models when recruitment drives do not materialise. Workforce Redesign Group has been established.
Trajectories have been identified for Memory Assessment Services and S-

Gaps in CONTROLS				
Identified Gaps in Controls : (Where one or more of the key controls on which the organisation is relying is not effective, or we do not have evidence that the controls are working)	How and when the Gap in control be addressed	By Who	By When	Progress
Continued lack of IT impacts on staff who have to work from home not having full accessibility. Estates issues ongoing with no access to clinical areas in some localities to see CYP and unable to access GP or LA sites thus restricting clinical sessions. Telephone assessments ongoing, virtual assessment offered but uptake not good for ASD and SCAMHS client group. Reliant on locally held data until reporting available via WPAS team. Currently with Software Development Team since go-live in April 2022.	Identify alternative venues/space to hold clinics.	Carroll, Mrs Liz	Completed	These actions have become control measures.
	Outcome measures to be in place to measure effectiveness/quality of services provided.	Marshall, Selina	30/06/2020 31/03/2023	New action allocated to Service Delivery Manager.
	Services will be in contact with individuals to provide information regarding community support, well being at home and guidance should their situation deteriorate.	Carroll, Mrs Liz	Completed	Action assigned to individual service leads.
	Funding for Interim Clinical Psychologist lead post to assist with the waiting lists and service development has been identified fixed term for 12 months and will work in conjunction with the new ASD Service Delivery Manager (in post 6 March) to address waiting lists.	Carroll, Mrs Liz	Completed	Interim Clinical Psychologist due to take up post by end of July 2022.
	To complete an impact assessment on the recommendations of the Autism Code of Practice.	vaughan, Catherine	30/04/2021 31/12/2022	New action.
	Directorate has funded 12 month fixed term post to accelerate the transition of the entire Directorate on to WPAS with a view to this improving waiting list management and demand and capacity planning. A further two posts have been funded within the Informatics service.	Amner, Karen	Completed	Mapping work continuing MAS, Admiral Nursing, DWBT and Perinatal. Data migration of Integrated Psychological Therapies spreadsheets completed 10.4.22 and service now inputting data at source. for IAS service with the new Service Delivery Manager has now gone live on the 1/11/22 Training sessions continue to be available.

CAMHS and there are systems in place to monitor waiting lists at service level, through IPAR and Directorate performance meetings.

Regular meetings with Estates to look at accessing/leasing/enhancing the current MH estates with a view to increase MH estate footprint. Within the service there is progress in terms of identifying clinical space due to the challenges experienced in accessing additional accommodation outside of the Directorate. Linking with wider Health Board, including corporate teams/Local Authority use of hubs. Works completed in Bro Cerwyn and staff have now returned. Units within the MH&LD footprint have been repurposed. IT are updating infrastructure to enable most efficient use of available space. Service Leads have been tasked with identifying alternative estate options for their areas.

Work underway across all services who have waiting times, be they intervention or assessment. Use of HB Third Party Contractor has begun and initial letters sent to those waiting appointments with the Memory Assessment Service, Integrated Autism Service and Adult ADHD. Public facing webpages with QR codes are also being developed to give further guidance and support whilst individuals are waiting. Template letters being developed within further areas. Monitoring of this process will be the responsibility of individual service leads.

Service Leads are exploring opportunities for outsourcing for CAMHS ASD and Psychological Therapies.

Request to be made for additional IT kit to support agile working.	Carroll, Mrs Liz	Completed	Request submitted 23.10.21.
Explore opportunities for outsourcing for CAMHS ASD and Psychological Therapies.	Carroll, Mrs Liz	Completed	Action included on service level risk register.
Directorate is working with the Health Board Performance Team to provide a more detailed report as to the current actions being taken by the Directorate.	Carroll, Mrs Liz	31/03/2023	This work is aligned to the migration of services to WPAS on a priority basis.

ASSURANCE MAP				Control RAG Rating (what the assurance is telling you about your controls)	Latest Papers (Committee & date)	Gaps in ASSURANCES								
Performance Indicators	Sources of ASSURANCE	Type of Assurance (1st, 2nd, 3rd)	Required Assurance Current Level			Identified Gaps in Assurance:	How are the Gaps in ASSURANCE will be addressed Further action necessary to address the gaps	By Who	By When	Progress				
Welsh Government performance indicators along with internal monitoring arrangements will be used to ensure the actions are having the desired effect or whether there is more that needs to be done.	Management monitoring of referrals	1st		Yellow	Update - Risk 1032: Mental Health and Learning Disabilities Waiting Lists - QSEC (Oct21) MHLD progress update on Planning Objective 5G - Board (Mar22)	System to improve analysis of patient experience	There are outcome measures in place within Psychological Therapies following intervention with a plan to develop a Task and Finish group to look at themes and areas which may require further improvement.	Carroll, Mrs Liz	Completed	Directorate have been asked to participate in Health Board wide Task & Finish group. The Directorate will raise the importance of Service User/Carer input into this group to ensure the patient experience is represented to inform the outcome. Outcome measures will form part of this project.				
	Monthly MH&LD Business Planning and Performance Group overseeing performance	2nd												
	MH&LD QSE Group overseeing patient outcomes	2nd												
	Update - Risk 1032: Mental Health and Learning Disabilities Waiting Lists - QSEC	2nd												
	W-PAS Internal Audit (reasonable assurance)	3rd												
	An update was requested by the Chair and provided for the August Quality, Safety, Assurance Committee.													

Date Risk Identified:	Jul-22
Strategic Objective:	5. Safe and sustainable and accessible and kind care

Executive Director Owner:	Carruthers, Andrew	Date of Review:	Dec-22
Lead Committee:	Quality, Safety and Experience Committee	Date of Next Review:	Jan-23

Risk ID:	1439	Principal Risk Description:	There is a risk that specialist wound management advice is delayed, and as such causes serious harm to patients potentially resulting in deep tissue damage, delays in vascular disorder diagnosis, and on occasion, sepsis. This is caused by the under-resourcing of the specialist tissue viability service to provide advice, oversight and monitoring of wound management across the Health Board. This could lead to an impact/affect on the quality of patients care and delay appropriate treatment in community would result in avoidable admissions, increased length of stay in hospital, and inappropriate treatment plans.
Does this risk link to any Directorate (operational) risks?			

Risk Rating:(Likelihood x Impact)	
Domain:	Safety - Patient, Staff or Public
Inherent Risk Score (L x I):	4x5=20
Current Risk Score (L x I):	4x4=16
Target Risk Score (L x I):	3x3=9
Tolerable Risk:	6
Trend:	↔

Month	Current Risk Score	Target Risk Score	Tolerance Level
Aug-22	16	9	6
Sep-22	16	9	6
Dec-22	16	9	6

Rationale for CURRENT Risk Score:
 This is a fragile service which has been extensively considered at Executive level and funding has been agreed on a recurrent basis for the Tissue Viability Nurse (TVN) service.

Rationale for TARGET Risk Score:
 Funding has been agreed and service model developed which when in place will reduce this risk to the target risk score of 9. Education throughout the Health Board needs to take place to reduce the risk to a tolerable level.

Key CONTROLS Currently in Place: (The existing controls and processes in place to manage the risk)	Gaps in CONTROLS				
	Identified Gaps in Controls : (Where one or more of the key controls on which the organisation is relying is not effective, or we do not have evidence that the controls are working)	How and when the Gap in control be addressed Further action necessary to address the controls gaps	By Who	By When	Progress
<p>Centralised referral route.</p> <p>Reinforced referral route across health board - Each team member to have time allocated to manage centralised referral route and triage referrals received from the Acute services only</p> <p>Tissue Viability Team to triage the referrals to the service - Standard procedure for all staff to follow when triaging referrals.</p> <p>Tissue Viability and Wound Management guidance policy.</p> <p>Maintaining attendance to essential meetings such as pressure damage scrutiny and MDTs.</p> <p>To continue with essential training across Health Board to encourage all staff to attend to promote best practice in wound care.</p> <p>Workforce:</p> <ul style="list-style-type: none"> • Weekly Team meeting. • Daily contact with team member on the Complex referrals • Ongoing clinical supervision to new member of the Tissue Viability Team • Existing part time staff working extra hours to support the service needs <p>Agreed funding to strengthen existing service model.</p> <p>Working with external company to develop and implement effective data collection which will support monitoring through the development of robust outcome measures.</p> <p>Service is currently operating in business continuity mode - extra hours offered to part time staff within the team and to work across different sites when required.</p> <p>Close working with heads of nursing in community and long term care.</p>	<p>Availability of specialist nurses</p> <p>Availability of specialist advice and IT infrastructure to support community and primary care staff in wound management</p> <p>Capacity of operational staff to attend wound management training across the health board (acute, community and primary care)</p>	<p>Appointment of staff with varying skill mix to the service</p>	<p>Dawkins, Helen</p>	<p>31/03/2023</p>	<p>Job descriptions are being developed to support skill mix requirements. Band 6 has been appointed and currently awaiting a start date, with ongoing advertising of remaining posts.</p>

ASSURANCE MAP				Control RAG Rating (what the assurance is telling you about your controls)	Latest Papers (Committee & date)	Gaps in ASSURANCES				
Performance Indicators	Sources of ASSURANCE	Type of Assurance (1st, 2nd, 3rd)	Required Assurance Current Level			Identified Gaps in Assurance:	How are the Gaps in ASSURANCE will be addressed Further action necessary to address the gaps	By Who	By When	Progress
	Datix incident reports monitored by scrutiny meetings	1st		Green		Ability to record outcome measures Base assessment required to understand the skills and knowledge of the workforce in wound management	To work with external company to develop and implement effective data collection which will support monitoring through the development of robust outcome measures.	Dawkins, Helen	31/12/2022 28/02/2023	Memorandum of Understanding has been approved, and currently awaiting final sign off from Legal Services. Ongoing meetings with company, with an expected implementation date of February 2023.
	No of wound management incidents monitored by QSEC	2nd					Develop virtual clinics to support access for providing advice to community and primary care staff	Dawkins, Helen	12/12/2022 31/01/2023	TVN team are being trained by the Digital directorate to use Attend Anywhere, which will then be rolled out to the community services via the community Heads of Nursing in January 2023.
	National Tissue Viability Group attended by HDUHB Senior Specialist Tissue Viability Nurse	3rd								

Date Risk Identified:	Apr-17
Strategic Objective:	N/A - Operational Risk

Executive Director Owner:	Carruthers, Andrew	Date of Review:	Nov-22
Lead Committee:	Quality, Safety and Experience Committee	Date of Next Review:	Dec-22

Risk ID:	129	Principal Risk Description:	There is a risk of the inability to deliver the statutory requirement to deliver an Urgent Primary Care Out of Hours Service for Hywel Dda patients This is caused by outdated and unsustainable GP dominant workforce model as GPs near retirement age and pay rate differentials (50% reduction over last 5 years) across Health Boards in Wales that impact the UHB's ability to recruit in the mid-long term. This could lead to an impact/affect on a detrimental impact on patient experience, as patients would need to go to an ED/MIU to receive treatment for a primary care complaint to be managed. The inability to provide an out of hours service would also add to day to day GP demand, delayed care for patients and over-reliance on other services such as district nursing and ART teams. The unscheduled care pathway including WAST/primary care could continue to suffer ongoing disruptions due to unmet demand for the OOH service seeking alternative management. This risk may also result in the unforeseen deterioration of an unmanaged condition in a patient, thus becoming more complex to resolve if not dealt with in a timely manner.
Does this risk link to any Directorate (operational) risks?			826, 1352

Risk Rating:(Likelihood x Impact)	
Domain:	Service/Business interruption/disruption
Inherent Risk Score (L x I):	5x4=20
Current Risk Score (L x I):	4x4=16
Target Risk Score (L x I):	3x3=9
26/11/2020 - Board 'Accept' Target Risk	
Tolerable Risk:	6
Trend:	

Month	Current Risk Score	Target Risk Score	Tolerance Level
May-19	12	6	6
Nov-19	12	6	6
Feb-20	15	6	6
Jul-20	12	6	6
Dec-20	12	12	6
May-21	12	10	6
Nov-21	16	10	6
May-22	16	10	6
Sep-22	16	10	6

Rationale for CURRENT Risk Score:

Fragility of out of hours service delivery continues. Rotas continue to be fragile, particularly at weekends and holiday periods. The inability to recruit GPs, caused primarily by an aging workforce, combined with increased demand for face-to-face, longer complex consultations, and increasing pressures in day-to-day primary care which is impacting the ability of GPs to be available for OOH shifts. In addition, some clinicians may preferentially work in other urgent emergency care initiatives such as 111 First or SDEC, as they are potentially much lighter (a pattern reported by SBU OOH service). This is exacerbated by the minimal numbers of newly qualified GPs applying or enquiring about OOH working patterns.

Any further absence on out of hours provision is likely to rapidly result in further deterioration of the current position. Availability of day time work, potentially leading to less availability of locums available for OOH. The Health Board currently have approximately 49 GPs (down from 100, 5 years ago) who regularly work the rotas, and an additional 10-20 who only work bank holidays rotas due to enhanced rates. ANP staff have reduced from 4 to 1 which covers 4 hours over a weekend period (0.1 WTE).

It is noted that with upcoming Bank Holidays over Christmas and New Year, and envisaged winter pressures, scoring to be reviewed at next risk review.

Rationale for TARGET Risk Score:

Service rota positions remain variable with continued shortfalls in clinical cover variably affecting service provision. Generally the rotas continue to be unstable, particularly at the weekends and holiday periods, and this is further compounded by the need for salaried staff to take annual leave and sessional staff to have time off to rest. Medium term actions are still required, especially in terms of service modernisation. Work to develop a long term plan for OOH Services has now recommenced following Covid-19 in order to reduce this risk on a permanent basis so to ensure the out of hours service provision is not interrupted. Workforce and service redesign are being considered which will take into account the findings of the recent peer review. There are concerns regarding the future stability of the service, and a need for a greater workforce development plan from central government is really required. TCS must include a more realistic workforce plan to future proof the whole Health Board.

Key CONTROLS Currently in Place: (The existing controls and processes in place to manage the risk)
<p># GP's rotas across the 3 counties are now managed centrally via the administration team based in Haverfordwest and using Rosta master to identify gaps in shifts and cover</p> <p># Dedicated GP Advice sessions in place at times of high demand (mostly weekends and bank holidays).</p> <p># Remote working telephone advice clinicians secured where required.</p> <p># Health Professional feedback form in use between clinicians, service management and 111 (WAST) leads.</p> <p># WAST Advance Paramedic Practitioner (APP) resource in place.</p> <p># Rationalisation of overnight bases in place since March 2020, now subject to service review.</p> <p># Workforce and service redesign requirements flagged as part of IMTP.</p> <p># Deputy Medical Director meetings on a weekly/bi-weekly basis, helps to ensure governance of the service.</p> <p># Regular review of risk register with Assurance & Risk Officer.</p> <p># Agreed pathway for PPH Minor Injury Unit in place.</p> <p># GP Hub in place where locum sessions can be accessed centrally to support service provision - however there are issues/delays with onboarding in Hywel Dda therefore this has not benefitted Hywel Dda.</p> <p># Ongoing recruitment activity and workforce planning/design in order to bolster the MDT model and maintaining service stability, and links developed with Primary Care to support this activity.</p> <p># Use of telephone consultations for service delivery alongside remote working, which has increased by 60% due to the pandemic.</p> <p># Business Continuity Plans in place to ensure continuity of service, and daily BCI meeting between the National 111 team, WAST and health boards.</p>

Gaps in CONTROLS				
Identified Gaps in Controls : (Where one or more of the key controls on which the organisation is relying is not effective, or we do not have evidence that the controls are working)	How and when the Gap in control be addressed	By Who	By When	Progress
<p>The ability to influence workforce participation remains limited due to the lack of contractual agreements (reliance on sessional staff). Difficulties in the recruitment and retention of staff. Competing with other services for same staff, eg SDEC.</p> <p>Concerns regarding the future stability of the service and wider impact on other services such as A&E and admissions and daytime services, GP practice and district nursing, and a need for a greater workforce development plan from central government is really required. TCS must include a more realistic workforce plan. Need for formalised workforce plan and redesign is still required - reflected in IMTP submission.</p> <p>In relation to service demand, activity has increased, however due to the ADASTRA outage in August 2022, the service is unable to obtain performance metrics for the last quarter. Covid continues to influence the risk-position with frequent short notice absences and limited opportunity to find cover in these circumstances. The focus on delivery of care via the telephone advice method is the significant factor in stabilising the risk at this time however there is a slow return to seeing more patients face to face with calls completed as telephone advice now reduced to 60-70%. Any reduction in capacity remains likely to require an increase in the risk level as the service delivery will be adversely affected.</p>	<p>Develop a sustainable out of hours service aligned to TCS and the Urgent Emergency Care (UEC) Programme taking into consideration the the findings of the internal service review and the recent Peer Review (when received).</p>	Richards, David	31/10/2023	Peer Review report has recently been received, and currently being discussed and management responses being drafted. However, progress has been impacted as a result of the ADASTRA outage. Meetings and discussions ongoing with UEC management.
	Implementation of the recommendations of Out of Hours Peer Review undertaken in Jul22	Richards, David	31/10/2023	Report has been received, and management responses currently being drafted.
	Educate GPs on importance of incident reporting to improve the quality of service	Archer, Dr Richard	31/01/2023	A journal club session will be used to address this with GPs.
	Develop a streamlined process to onboard GPs from the All Wales GP Hub with workforce colleagues	Archer, Dr Richard	31/01/2023	Ongoing discussion following the publication of internal and likely action in peer review (when available).

	<p>Low levels of incident reporting and feedback to improve understanding of quality of service.</p> <p>Onboarding of GPs in Hywel Dda from GP Hub hasn't translated into any significant improvement in shift uptake</p> <p>Peer review identified cultural issues within the service.</p> <p>The impact of the ADAstra cyber security hack has resulted in the inability / limited opportunity to use the system in a non-NHS environment. It has also impacted on the availability of data to monitor performance, capacity, and complaints / incident management.</p> <p>While PPH MIU Pathway in place, the site are experiencing difficulties with regards to GP cover, affecting the efficiency of this pathway.</p>	<p>Work with the workforce relationship team to improve the relationship between management, clinical staff and GPs</p>	<p>Richards, David</p>	<p>31/10/2023</p>	<p>Have met with relationship managers and are working on developing structures, however this is being impacted by staff availability and the ability to progress at speed. In addition, timescales have slipped as a direct result of the ADAstra outage as this has been a priority for the OOH service in Q3 2022/23.</p>
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Date Risk Identified:	Jan-22
Strategic Objective:	5. Safe and sustainable and accessible and kind care

Executive Director Owner:	Carruthers, Andrew	Date of Review:	Nov-22
Lead Committee:	Quality, Safety and Experience Committee	Date of Next Review:	Dec-22

Risk ID:	1340	Principal Risk Description:	There is a risk of avoidable harm (death and serious deterioration in clinical condition and outcomes) for HDUHB patients requiring NSTEMI pathway care. This is caused by a combination of delayed pathway referral from HDUHB to SBUHB and Cardiac Catheter Laboratory capacity constraints at Morrison Hospital, which is further compounded by transport and logistical challenges in transferring patients in a timely manner, particularly from WGH and BGH. This could lead to an impact/affect on delayed NSTEMI treatments leading to significant adverse clinical outcomes for patients, increased length of stay, increased risk of exposure hospital acquired infection/risks, impaired patient flow into Morrision Hospital resulting in cardiology/unscheduled care flow pressures within HDUHB acute sites. NSTEMI pathway inadequacy is also resulting in poorer patient experience due to anxieties associated with delayed treatment/prolonged hospitalisation, together with poorer staff work experience/satisfaction given associated clinical and outcome risks for patients.
Does this risk link to any Directorate (operational) risks?			

Risk Rating:(Likelihood x Impact)	
Domain:	Safety - Patient, Staff or Public
Inherent Risk Score (L x I):	5x4=20
Current Risk Score (L x I):	4x4=16
Target Risk Score (L x I):	1x4=4
Tolerable Risk:	6
Trend:	↔

Rationale for CURRENT Risk Score:

NICE guidelines for Acute Coronary Syndromes (NG185) recommend 'coronary angiography (with follow-on PCI if indicated) within 72 hours (3 days) of 'admission/presentation' for people with unstable angina or NSTEMI who have an intermediate or higher risk of adverse cardiovascular events' (recommendation 1.1.6). In support of this recommendation/target, we aim to 'refer' patients to Morrision Cardiac Centre for angiography within 24 hours of 'admission/presentation' in order to achieve a total pathway target of 72 hours. As a baseline, in 2021 the median time between 'admission/presentation' and 'referral' was 39.5 hours and for the entire pathway ('admission/presentation' to 'angiography') it was 213.5 hours (8.9 days). For context, the 2021 position was a deterioration from that maintained in 2019 where the PPH Treat and Repatriate Service supported a median 'admission/presentation' to 'angiography' wait of 120 hours (5 days) - this service was suspended at the outset of COVID-19 due to PPH site pressures. Although Jan-October 2022 data demonstrates some improvement, the NSTEMI/ACS pathway continues to fall short of the NICE recommended 72 hours pathway, with median time between 'presentation' and 'referral' at 37 hours and entire pathway duration ('admission/presentation' to 'angiography') at 169 hours (7 days)

Rationale for TARGET Risk Score:

The former PPH Treat and Repatriate Service achieved significant improvements for this pathway by a reduction in the median admission/presentation to angiography waiting time from 312 hours (13 days) to 120 hours (5 days) between January 2019 and April 2019. As a service we are aiming to deliver a NICE-complaint pathway and comply with the 72 hour recommendation/target. HDUHB Cardiology Pathway Transformation Project has identified 4 key areas for improvement in the NSTEMI pathway, these are:

1. Reduce length of time from presentation to referral to a median time of 24 hours (potential workforce and system/process solutions)
2. Re-instate NSTEMI Treat and Repatriation service and/or identify steps to improve patient transportation and logistics
3. Increase regional capacity at Morrision Cardiac Centre to meet the 72 hour NICE guidelines
4. If point 3 above is not realised, explore options to commission NSTEMI pathway angiography service from an alternative provider/s across Wales

Key CONTROLS Currently in Place: (The existing controls and processes in place to manage the risk)
<p># All patients are risk-scored by HDUHB Teams on assessment and referral onto NSTEMI pathway.</p> <p># Medical and nursing staff review patients daily and update the Sharepoint referral database as appropriate to communicate and escalate changes in level of risk/priority for patients awaiting transfer.</p> <p># Increased numbers of patients waiting / prolonged transfer delays are identified on daily Sitrep Calls and escalated by HDUHB Cardiology Clinical Lead / SDM to SBUHB Cardiology Clinical Lead / Cardiology Manager.</p> <p># All patients are risk-scored by cardiac team at SBUHB on receipt of patient referral from HDUHB and discussed at weekly Regional MDT.</p> <p># Weekday telephone call between SBUHB Cardiology Coordinator and all 4 hospital Coronary Care Units (CCUs) to review patients awaiting transfer, in particular the progress on identified work-up actions.</p> <p># Bi-monthly operational meeting with Swansea Bay UHB (SBUHB) to monitor activity/patient flow and address associated risks/issues.</p> <p># Reporting arrangements in place to monitor emergency and elective waiting times.</p> <p># NSTEMI Pathway Improvement workstream within HDUHB Cardiology transformation project</p> <p># NSTEMI Pathway Improvement workstream within ARCH Cardiology Programme</p>

Gaps in CONTROLS				
Identified Gaps in Controls : (Where one or more of the key controls on which the organisation is relying is not effective, or we do not have evidence that the controls are working)	How and when the Gap in control be addressed	By Who	By When	Progress
<p>Continuing delays in referring HDdUHB patients to Morriston Cardiac Centre for angiography</p> <p>Compromised logistics and patient pathway flow (particularly for BGH and WGH) due to absence of a Treat and Repatriation service and/or effective patient transportation</p> <p>Inadequate Cardiac Catheter Laboratory capacity at Morriston Cardiac Centre</p>	<p>Introduce a number of system and process solutions to reduce presentation to referral to a median time of 24 hours:</p> <p>1: Staff awareness and education initiative to highlight urgency and timeliness of NSTEMI patient pathway management - ACTION CLOSED;</p> <p>2: A Clinical Decision Tool to aid early patient identification and referral;</p> <p>3: Pilot of daily HDdUHB/SBUHB Teams call to review/prioritise patient referrals and need for HDdUHB Cardiologist/SBUHB Interventionist telephone referral - - ACTION CLOSED;</p> <p>4: Pilot of a weekend HDdUHB Cardiologist on-call advice line to support referral process;</p> <p>5: Pilot of Chest Pain Nurse NSTEMI patient review and processing of referrals at GGH and PPH between September '22 and March '23.</p>	Smith, Paul	31/08/2022 31/03/2023	<p>Service and NSTEMI Project group are progressing additional risk actions required:</p> <p>1: NSTEMI/ACS awareness update presented at HDUHB-wide Grand Round Medical Meeting in Apr '22 - ACTION CLOSED;</p> <p>2: A Clinical Decision Tool to aid early patient identification drafted and for approval at ARCH ACS Meeting - PROGRESSING;</p> <p>3: Pilot of daily HDdUHB/SBUHB Teams call to review/prioritise patient referrals in discussion - decision taken by ARCH ACS Group not to progress - ACTION CLOSED;</p> <p>4 Pilot of a weekend HDdUHB Cardiologist on-call advice line running during April and May '22. Report of outcomes due Nov '22 - PROGRESSING;</p> <p>5: Pilot of Chest Pain Nurse NSTEMI patient review and processing of referrals at GGH and PPH currently in progress with interim impact report due Jan '23 - PROGRESSING.</p>
	<p>Introduce workforce solutions to support the reduction of presentation to referral to a median time of 24 hours:</p> <p>1 Consultant Cardiologist</p> <p>3 Band 8a ANPs</p> <p>1 Band 4 Pathway Coordinator</p>	Smith, Paul	31/08/2022 31/03/2023	<p>Indicative investment highlighted in IMTP - HDdUHB detailed business case requirements to be included alongside SBUHB business case currently in development for next ARCH Regional Recovery Group meeting.</p>
	<p>Re-instate of NSTEMI Treat and Repatriation service and/or identify steps to improve patient transportation and logistics.</p>	Smith, Paul	31/12/2022 31/01/2023	<p>PPH NSTEMI/ACS Treat & Repatriate Pathway / Service scheduled to re-commence in January 2023. T&F Group established to support timely operationalisation.</p>

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Increase regional capacity at Morriston Cardiac Centre to meet the 72 hour NICE guidelines.	Smith, Paul	31/12/2022 31/03/2022	Supported by ARCH, SBUHB submitted SBAR outlining plans for increased capacity and delivery of 7 day Cardiac Cath Lab service at ARCH Regional Recovery Group on 17th March '22. Refresh business case for presentation at next ARCH Regional Recovery Group being progressed. Morriston Cardiac Centre currently operating a 'perfect 6 weeks' to test and evidence improvement from increase Cath Lab capacity and ring-fenced Short Stay Unit.
Explore options to commission NSTEMI pathway angiography service from an alternative provider/s across Wales	Smith, Paul	Completed	HDUHB Commissioning and Contracting Team have approached Cardiology NSTEMI/ACS centres/facilities across Wales and on the Wales/England borders and there is no available capacity to support HDUHB NSTEMI/ACS pathway. ARCH Regional Cardiology Project Group and HDUHB ACS Working Group continue to pursue a plan that will see an improved Cardiac Cath Lab service from Morriston Cardiac Centre.

ASSURANCE MAP			
Performance Indicators	Sources of ASSURANCE	Type of Assurance (1st, 2nd, 3rd)	Required Assurance
			Current Level
	Daily/weekly/monthly/operational monitoring arrangements by management	1st	
	Audit of NSTEMI pathway undertaken by Cardiology Clinical Lead/SDM on monthly basis	1st	
	IPAR Performance Report to SDOPC & Board	2nd	
	Monthly oversight by WG	3rd	

Control RAG Rating (what the assurance is telling you about your controls)
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Latest Papers (Committee & date)
Cardiac Waiting Lists - QSEC (Feb22)

Gaps in ASSURANCES				
Identified Gaps in Assurance:	How are the Gaps in ASSURANCE will be addressed Further action necessary to address the gaps	By Who	By When	Progress
None Identified.				

Date Risk Identified:	Jan-19
Strategic Objective:	N/A - Operational Risk

Executive Director Owner:	Carruthers, Andrew	Date of Review:	Nov-22
Lead Committee:	Quality, Safety and Experience Committee	Date of Next Review:	Dec-22

Risk ID:	684	Principal Risk Description:	<p>There is a risk radiology service provision from breakdown of key radiology imaging equipment (specifically insufficient CT capacity UHB-wide, and the general rooms and fluroscopy room in Bronglais). This is caused by equipment not being replaced in line with RCR (Royal College of Radiologists) and other guidelines.</p> <p>This could lead to an impact/affect on patient flows resulting from delays in diagnosis and treatments, delays in discharges, increased waiting times on cancer pathways, increased staffing costs to minimise the impact on patients when breakdowns occur and increased number of breaches over 8 weeks due to increased downtime.</p>
Does this risk link to any Directorate (operational) risks?			925, 114

Risk Rating:(Likelihood x Impact)	
Domain:	Service/Business interruption/disruption
Inherent Risk Score (L x I):	5x4=20
Current Risk Score (L x I):	3x4=12
Target Risk Score (L x I):	2x4=8
Tolerable Risk:	6
Trend:	↓

Month	Current Risk Score	Target Risk Score	Tolerance Level
Jul-19	16	6	6
Feb-20	16	6	6
Jun-20	16	6	6
Jan-21	20	6	6
Apr-21	20	12	6
Dec-21	20	12	6
Mar-22	16	12	6
Jul-22	16	12	6
Nov-22	12	8	6

Rationale for CURRENT Risk Score:

The UHB's stock of imaging equipment routinely breaks down causing disruption to diagnostic imaging services across all sites which has a significant impact on the UHB's ability to meet its RTT target and impact to patients can include delays in diagnosis and treatment. CT and MR scanners have been replaced, and has reduced the frequency of machine downtime compared to previous experience. CT scanner in BGH is due to be upgraded by the end of financial year 2022/23. PPH MRI scanner is due to be included in the next batch of upgrades, pending financial support for 2023/24.

The risk score has been reduced to 12 in November 2022 reflecting that some equipment has been installed and is operational. A costed plan along with a rolling programme for the installation of additional equipment is in place. The next batch of equipment for replacement has been prioritised and identified, however no funding has yet been secured (for FY 2023/24). A paper was submitted to the September Capital Sub-Committee meeting for information.

Rationale for TARGET Risk Score:

While equipment has been installed as part of the current WG funding allocations, there is uncertainty as at November 2022 with regards to continued equipment replacements for financial year 2023/24 due to the discontinuation of a dedicated imaging equipment replacement allocation. New All Wales PACS procurement requires all equipment to be DR for compatibility. This has meant that replacement priorities have changed, and that some of the older DR compliant equipment are now overdue for replacement, and at risk of being de-prioritised.

With more modern equipment, breakdowns will be less likely and less significant in terms of downtime together with a reduced impact on the diagnostic services at the remaining hospital sites. Improved business continuity plans will also help reduce the impact of equipment breakdown across the UHB.

Key CONTROLS Currently in Place: (The existing controls and processes in place to manage the risk)
<p># Service maintenance contracts in place and regularly reviewed to ensure value for money is maintained.</p> <p># The difficult to source spares can be obtained through bespoke manufacture but this invariably results in inherent delays in returning equipment to service.</p> <p># Regular quality assurance checks (eg daily checks).</p> <p># Use of other equipment/transfer of patients across UHB during times of breakdown.</p> <p># Ability to change working arrangements following breakdowns to minimise impact to patients.</p> <p># Site business continuity plans in place.</p> <p># Disaster recovery plan in place.</p> <p># Replacement programme has been re-profiled by risk, usage and is influenced by service reports. Some funding has been secured from AWCP for some replacements but does not cover all outdated equipment nor the future requirements.</p> <p># Escalation process in place for service disruptions/breakdowns.</p> <p># WG Funding agreed for 2 x CT scanners (GGH & WGH) - now installed</p> <p># Additional CT secured in the form of a mobile van in December 2020.</p> <p># Newly created National Imaging and Capital Priorities Group ensures there is a robust governance process to support a national, sustainable clinically focused capital equipment programme across Wales. This will ensure that all HB's in Wales agree to a prioritisation process which will allow for timely equipment procurement and delivery to support healthcare demands across Wales.</p>

Gaps in CONTROLS				
Identified Gaps in Controls : (Where one or more of the key controls on which the organisation is relying is not effective, or we do not have evidence that the controls are working)	How and when the Gap in control be addressed	By Who	By When	Progress
<p>Limitation of spare parts for some older equipment leading to extended outages. This issue may be compounded by Brexit.</p> <p>Increased use of site contingency plans puts pressures on patient flows, discharges, diagnosis at other sites.</p> <p>Reliance on AWCP for replacement of equipment.</p>	<p>Work with planning colleagues about sourcing capital funding through DCP and AWCP.</p>	<p>Roberts-Davies, Gail</p>	<p>Completed</p>	<p>Two business cases have been funded by WG. Further Business Cases for the further 3 CT scanners and or General Rooms (depending on priority) to be submitted in 2022/23. Submit updated paper to CEIMTSC to outline current priorities and funding requirements from DCP and AWCP.</p> <p>21/12/2021 - discussion with the Head of Radiology has confirmed that all relevant funding has been sourced, with ongoing work to install equipment / updates to be made alongside the Estates time. Action complete with regards to funding.</p>
	<p>Installation of CT Scanner at Withybush General Hospital</p>	<p>Roberts-Davies, Gail</p>	<p>Completed</p>	<p>Timeline is in line with draft scheme of work, and at this time could be subject to delays should issues arise. As of 25/05/2022 the installation of this equipment is currently running to schedule.</p>
	<p>Installation of scanner at Prince Philip Hospital</p>	<p>Roberts-Davies, Gail</p>	<p>Completed</p>	<p>Timeline is in line with draft scheme of work, and at this time could be subject to delays should issues arise. Installed and operational in October 2022.</p>
	<p>Installation of CT Scanner at Bronglais General Hospital</p>	<p>Roberts-Davies, Gail</p>	<p>28/02/2023</p>	<p>Timeline is in line with draft scheme of work, and at this time could be subject to delays should issues arise.</p>
	<p>Installation of DR room in Prince Philip Hospital</p>	<p>Roberts-Davies, Gail</p>	<p>Completed</p>	<p>Timeline is in line with draft scheme of work, and at this time could be subject to delays should issues arise. Installed and operational in October 2022.</p>
	<p>Installation of DR room in Glangwili General Hospital</p>	<p>Roberts-Davies, Gail</p>	<p>Completed</p>	<p>Timeline is in line with draft scheme of work, and at this time could be subject to delays should issues arise. Installed and operational in November 2022.</p>

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Installation of DR room in Witherbush General Hospital	Roberts-Davies, Gail	31/12/2022	Timeline is in line with draft scheme of work, and at this time could be subject to delays should issues arise.
Installation of fluoroscopy room in Bronglais General Hospital	Roberts-Davies, Gail	28/02/2023	Timeline is in line with draft scheme of work, and at this time could be subject to delays should issues arise.
Replacement of Mammography equipment at Prince Philip Hospital	Roberts-Davies, Gail	31/03/2023	Expected to be operational by the end of the financial year with additional funding secured.
To confirm the capital funding to replace existing aged equipment for FY 2023/24	Roberts-Davies, Gail	31/03/2023	A prioritisation list of aged equipment to be replaced has been devised as at November 2022, however confirmation needed on funding in order to undertake the required work.

ASSURANCE MAP			
Performance Indicators	Sources of ASSURANCE	Type of Assurance	Required Assurance
		(1st, 2nd, 3rd)	Current Level
Reduction of waiting times to under 6 weeks by Mar22. Reduction in overtime costs to nil by Mar22.	Monthly reports on equipment downtime and overtime costs	1st	Blue
	IPAR report overseen by PPPAC and Board bi-monthly	2nd	Pink
	Internal Review of Radiology Service Report (Reasonable Rating)	3rd	Pink
	WAO Review of Radiology - Apr17	3rd	Blue
	External Review of Radiology - Jul18	3rd	Blue

Control RAG Rating (what the assurance is telling you about your controls)
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Latest Papers (Committee & date)

Gaps in ASSURANCES				
Identified Gaps in Assurance:	How are the Gaps in ASSURANCE will be addressed Further action necessary to address the gaps	By Who	By When	Progress
Lack of process of formal post breakdown review.				

Date Risk Identified:	Oct-21
Strategic Objective:	3. Striving to deliver and develop excellent services

Executive Director Owner:	Kloer, Dr Philip	Date of Review:	Nov-22
Lead Committee:	Quality, Safety and Experience Committee	Date of Next Review:	Jan-23

Risk ID:	1337	Principal Risk Description:	There is a risk of reputational harm if the health board is found to have not managed the TB outbreak in Llwynhendy as well as it could have. This is caused by the potential findings of the forthcoming HB and PHW commissioned external review into the outbreak and its management since 2010, and whether each stage was conducted in accordance with best practice guidance in place at the time of each phase of the outbreak. This could lead to an impact/affect on stakeholder confidence in the Health Board's ability to manage future outbreaks, local and national media interest, and additional scrutiny from key stakeholders such as WG.
Does this risk link to any Directorate (operational) risks?			

Risk Rating:(Likelihood x Impact)	
Domain:	Adverse publicity/reputation
Inherent Risk Score (L x I):	5x4=20
Current Risk Score (L x I):	2x4=8
Target Risk Score (L x I):	2x4=8
Tolerable Risk:	8
Trend:	↓

Month	Current Risk Score	Target Risk Score	Tolerance Level
Jan-22	12	8	8
Feb-22	16	8	8
Jun-22	12	8	8
Jul-22	12	8	8
Dec-22	8	8	8

Rationale for CURRENT Risk Score:
 The Final report from the External Review Team is expected on the 2nd Dec 2022. This has followed feedback from PHW and the HB on the initial draft report. The paper will then be presented at the Public Board in January 2023. An action plan in relation to each recommendation will be formulated and, where required, additional resource will be described and considered against the current risks identified.

Rationale for TARGET Risk Score:
 The development of a cohesive TB database to enable cross-referencing of contacts is also key requirement to mitigate this risk.

Key CONTROLS Currently in Place: (The existing controls and processes in place to manage the risk)
<p>PHW Health Protection support supporting outbreak and contacting Paediatric cases who previously not attended</p> <p>All contacts have been contacted at least once and families of the deceased have been formally communicated with advising of the review</p> <p>Treatment plans put in place where required</p> <p>A Project team has been established to support the review panel, led by a Project Manager and include administrative support, Communications and Information and Communications Technology</p> <p>Health Board commitment to be open about the findings from the Review with stakeholders and the public and ensure these are addressed.</p> <p>Public Service Ombudsman for Wales (PSOW) kept informed on progress of review</p> <p>Communication strategy agreed through the TB Joint Oversight Group to support the publication of the final report in the Autumn of 2022</p>

Gaps in CONTROLS				
Identified Gaps in Controls : (Where one or more of the key controls on which the organisation is relying is not effective, or we do not have evidence that the controls are working)	How and when the Gap in control be addressed	By Who	By When	Progress
<p>Ability to identify everyone as a contact from TB outbreak from different sources</p> <p>Having an agreed effective response to TB aligned to PHW to ensure that management of an outbreak is within an agreed process</p>	<p>Development of TB Database to enable cross-referencing of contacts</p>	<p>Tracey, Anthony</p>	<p>31/03/2022 30/09/2022</p>	<p>A system has been developed however further work is required to enable is cross-reference contacts.</p>

ASSURANCE MAP			
Performance Indicators	Sources of ASSURANCE	Type of Assurance	Required Assurance
		(1st, 2nd, 3rd)	Current Level
	TB Operational Task & Finish Group facilitating the external review	1st	
	TB oversight group for operational response co-chaired by HB and PHW Medical Directors	2nd	
	Internal review presented to an In-Committee Board meeting in Nov19	2nd	

Control RAG Rating (what the assurance is telling you about your controls)

Latest Papers (Committee & date)
An External Review of the Llwynhendy Tuberculosis Outbreak - Board (Sep21)

Gaps in ASSURANCES				
Identified Gaps in Assurance:	How are the Gaps in ASSURANCE will be addressed	By Who	By When	Progress
External review of TB outbreak and management to inform the approach to the management of TB disease in Wales	To commission, jointly with PHW, an external review of the outbreak and its management, to inform the approach to the management of TB disease in Wales. (Timescale TBC)	Kloer, Dr Philip	31/05/2022 31/12/2022	In response to the COVID-19 pandemic, a decision was taken early in 2020 to pause the review. Professor Mike Morgan has recently been appointed as the chair of the external review panel and has been formally commissioned, on 16Aug21, to oversee the review. The review has commenced with anticipated completion in autumn 2022.

RISK SCORING MATRIX

Likelihood x Impact = Risk Score

Likelihood	1	2	3	4	5
Descriptor	Rare	Unlikely	Possible	Likely	Almost Certain
Frequency - How often might it/does it happen? <small>(how many times will the adverse consequence being assessed actually be realised?)</small>	This will probably never happen/recur (except in very exceptional circumstances). Not expected to occur for years.*	Do not expect it to happen/recur but it is possible that it may do so. Expected to occur at least annually.*	It might happen or recur occasionally. Expected to occur at least monthly.*	It might happen or recur occasionally. Expected to occur at least weekly.*	It will undoubtedly happen/recur, possibly frequently. Expected to occur at least daily.*
<small>* time-framed descriptors of frequency</small>					
Probability - Will it happen or not? <small>(what is the chance the adverse consequence will occur in a given reference period?)</small>	(0-5%*)	(5-25%*)	(25-75%*)	(75-95%*)	(>95%*)
<small>*used to assign a probability score for risks related to time-limited or one off projects or business objectives.</small>					
Risk Impact Domains	Negligible - 1	Minor - 2	Moderate - 3	Major - 4	Catastrophic - 5
Safety of Patients, Staff or Public	Minimal injury requiring no/minimal intervention or treatment. No time off work.	Minor injury or illness, requiring minor intervention. Requiring time off work for >3 days.	Moderate injury requiring professional intervention. Requiring time off work for 4-14 days.	Major injury leading to long-term incapacity/disability. Requiring time off work for >14 days.	Incident leading to death. Multiple permanent injuries or irreversible health effects.
		Increase in length of hospital stay by 1-3 days.	Increase in length of hospital stay by 4-15 days. Agency reportable incident. An event which impacts on a small number of patients.	Increase in length of hospital stay by >15 days. Mismanagement of patient care with long-term effects.	An event which impacts on a large number of patients.
Quality, Complaints or Audit	Peripheral element of treatment or service suboptimal.	Overall treatment or service suboptimal.	Treatment or service has significantly reduced effectiveness.	Non-compliance with national standards with significant risk to patients if unresolved.	Totally unacceptable level or quality of treatment/service.
	Informal complaint/inquiry.	Formal complaint. Local resolution.	Formal complaint - Escalation.	Multiple complaints/ independent review. Low achievement of performance/delivery requirements.	Gross failure of patient safety if findings not acted on. Inquest/ombudsman inquiry.
		Single failure to meet internal standards. Minor implications for patient safety if unresolved. Reduced performance if unresolved.	Repeated failure to meet internal standards. Major patient safety implications if findings are not acted on.	Critical report.	Gross failure to meet national standards/performance requirements.
Workforce & OD	Short-term low staffing level that temporarily reduces service quality (< 1 day).	Low staffing level that reduces the service quality.	Late delivery of key objective/ service due to lack of staff.	Uncertain delivery of key objective/service due to lack of staff.	Non-delivery of key objective/service due to lack of staff.
			Unsafe staffing level or competence (>1 day). Low staff morale.	Unsafe staffing level or competence (>5 days). Loss of key staff.	Ongoing unsafe staffing levels or competence. Loss of several key staff.
			Poor staff attendance for mandatory/key training.	Very low staff morale. No staff attending mandatory/ key training.	No staff attending mandatory training /key training on an ongoing basis.
Statutory Duty or Inspections	No or minimal impact or breach of guidance/ statutory duty.	Breach of statutory legislation.	Single breach in statutory duty.	Enforcement action	Multiple breaches in statutory duty.
		Reduced performance levels if unresolved.	Challenging external recommendations/ improvement notice.	Multiple breaches in statutory duty. Improvement notices.	Prosecution. Complete systems change required.
				Low achievement of performance/delivery requirements.	Low achievement of performance/delivery requirements.
				Critical report.	Severely critical report.

Adverse Publicity or Reputation	Rumours.	Local media coverage – short-term reduction in public confidence. Elements of public expectation not being met.	Local media coverage – long-term reduction in public confidence.	National media coverage with <3 days service well below reasonable public expectation.	National media coverage with >3 days service well below reasonable public expectation. AMs concerned (questions in the Assembly).
	Potential for public concern.				Total loss of public confidence.
Business Objectives or Projects	Insignificant cost increase/schedule slippage.	<5 per cent over project budget. Schedule slippage.	5–10 per cent over project budget. Schedule slippage.	Non-compliance with national 10–25 per cent over project budget. Schedule slippage. Key objectives not met.	Incident leading >25 per cent over project budget. Schedule slippage. Key objectives not met.
Finance including Claims	Small loss.	Loss of 0.1–0.25 per cent of budget.	Loss of 0.25–0.5 per cent of budget.	Uncertain delivery of key objective/Loss of 0.5–1.0 per cent of budget.	Non-delivery of key objective/ Loss of >1 per cent of budget.
	Risk of claim remote.	Claim less than £10,000.	Claim(s) between £10,000 and £100,000.	Claim(s) between £100,000 and £1 million.	Failure to meet specification/ slippage Claim(s) >£1 million.
Service or Business interruption or disruption	Loss/interruption of >1 hour. Minor disruption.	Loss/interruption of >8 hours.	Loss/interruption of >1 day.	Loss/interruption of >1 week.	Permanent loss of service or facility.
		Some disruption manageable by altered operational routine.	Disruption to a number of operational areas within a location and possible flow onto other locations.	All operational areas of a location compromised. Other locations may be affected.	Total shutdown of operations.
Environmental	Minimal or no impact on the environment.	Minor impact on environment.	Moderate impact on environment.	Major impact on environment.	Catastrophic/critical impact on environment.
Health Inequalities/ Equity	Minimal or no impact on our attempts to reduce health inequalities/improve health equity	Minor impact on our attempts to reduce health inequalities or lack of clarity on the impact we are having on health equity	Moderate impact on our attempts to reduce health inequalities or lack of sufficient information that would demonstrate that we are not widening the gap. Indications that we are having no positive impact on health improvement or health equity	Major impact on our attempts to reduce health inequalities. Validated data suggesting we are not improving the health of the most disadvantaged in our population whilst clearly supporting the least disadvantaged. Validated data suggesting we are having no impact on health improvement or health equity.	Validated data clearly demonstrating a disproportionate widening of health inequalities or a negative impact on health improvement and/or health equity

RISK MATRIX

IMPACT ↓	LIKELIHOOD →				
	RARE 1	UNLIKELY 2	POSSIBLE 3	LIKELY 4	ALMOST CERTAIN 5
CATASTROPHIC 5	5	10	15	20	25
MAJOR 4	4	8	12	16	20
MODERATE 3	3	6	9	12	15
MINOR 2	2	4	6	8	10
NEGLIGIBLE 1	1	2	3	4	5

RISK ASSESSMENT - FREQUENCY OF REVIEW

RISK SCORED	DEFINITION	ACTION REQUIRED (GUIDE ONLY)	MINIMUM REVIEW FREQUENCY
15-25	Extreme	Unacceptable. Immediate action must be taken to manage the risk. Control measures should be put into place which will have an effect of reducing the impact of an event or the likelihood of an event occurring. A number of control measures may be required.	This type of risk is considered extreme and should be reviewed and progress on actions updated, at least monthly.
8-12	High	Very unlikely to be acceptable. Significant resources may have to be allocated to reduce the risk. Urgent action should be taken. A number of control measures may be required.	This type of risk is considered high and should be reviewed and progress on actions updated at least bi-monthly.
4-6	Moderate	Not normally acceptable. Efforts should be made to reduce risk, providing this is not disproportionate. Establish more precisely the likelihood & harm as a basis for determining the need for improved measures.	This type of risk is considered moderate and should be reviewed and progress on actions updated at least every six months.
1-3	Low	Risks at this level may be acceptable. If not acceptable, existing controls should be monitored & reviewed. No further action or additional controls are required.	This type of risk is considered low risk and should be reviewed and progress on actions updated at least annually.