

## Integrated Care Board

<b>Date of meeting</b>	22 January 2026
<b>Title of paper</b>	Quarterly Report of the Board Assurance Framework
<b>Presented by</b>	Debra Atkinson, Company Secretary/Director of Corporate Governance
<b>Author</b>	Debra Atkinson, Company Secretary/Director of Corporate Governance Claire Moore, Head of Risk Assurance and Delivery
<b>Agenda item</b>	8
<b>Confidential</b>	No

### Executive summary

The ICB's strategic risk management processes are centred on the Board Assurance Framework (BAF), which is a structured way of identifying the management of the principal risks to the achievement of the ICB's strategic objectives.

The BAF includes the main sources of assurance in support of the achievement of the ICB's core aims/objectives; it also plays a key role in informing the production of the Chief Executive's Annual Governance Statement (Annual Report).

This report presents the BAF in full and summarises the progress made in the management of the principal risks held on the BAF during quarter 3 2025/26; this includes three recommendations for changes in risk scores and target risks. Also provided, is a summary of risks held on the ICB's Operational Risk Register (ORR) which meet the threshold for corporate oversight and are held at a risk score of "20" or above, in accordance with the ICB's Risk Management Policy and reporting framework.

Following the completion of Mersey Internal Audit Agency's (MIAAs) Phase 1 review of the ICB's Assurance Framework in December, the report includes a brief update on the recommendations made and follow-up action taken.

Finally, the report highlights the full review of the BAF, Strategic Objectives and risk appetite over the coming months to ensure they are aligned to the development and implementation of the ICB's strategic commissioning plans and new target operating model.

### Public and Stakeholder Engagement

N/A

### Recommendations

The board is requested to:

- **Note** the contents of the report.
- **Note** the progress made during Quarter 3 2025/26 to support the management of risks held on the BAF.
- **Review and approve** the recommendations to BAF risk scores and target risk score dates as summarised in section 3.4 of the report.
- **Note** the positive outcomes of MIAA's Phase 1 review of the ICB's Assurance Framework and the actions undertaken.

- **Note** those risks held on the ORR (corporate oversight) which are held at a score of 20 or above.
- **Note** the full review and refresh of the BAF, Strategic Objectives and Board risk appetite in Q1 of 2026/27.

Which Strategic Objective/s does the report relate to:		Tick
SO1	Improve quality, including safety, clinical outcomes, and patient experience	✓
SO2	To equalise opportunities and clinical outcomes across the area	✓
SO3	Make working in Lancashire and South Cumbria an attractive and desirable option for existing and potential employees	✓
SO4	Meet financial targets and deliver improved productivity	✓
SO5	Meet national and locally determined performance standards and targets	✓
SO6	To develop and implement ambitious, deliverable strategies	✓

Implications				
	Yes	No	N/A	Comments
Associated risks	✓			As outlined in the report
Are associated risks detailed on the ICB Risk Register?	✓			As outlined in the report
Financial Implications			✓	

**Where paper has been discussed** (list other committees/forums that have discussed this paper)

Meeting	Dates	Outcomes
<b>Executive Committee</b>	Monthly	Endorsed

**Conflicts of interest associated with this report**

Not applicable

Impact assessments				
	Yes	No	N/A	Comments
Quality impact assessment completed			✓	Not required
Equality impact assessment completed			✓	Not required
Data privacy impact assessment completed			✓	Not required

**Report authorised by:** Aaron Cummins, Chief Executive

# Integrated Care Board – 22 January 2026

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## Quarterly Report of the Board Assurance Framework

### 1. Introduction

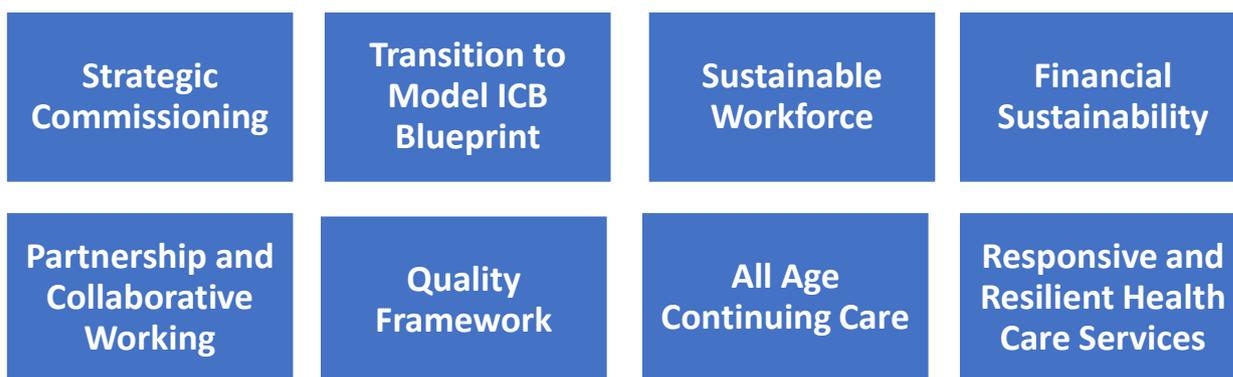
- 1.1 The purpose of the report is to present the board with a quarterly update on the risks held on the Board Assurance Framework (BAF) for review and approval.
- 1.2 The report summarises the progress made in Quarter 3 2025/26 to the management of risks identified as having the potential to impact on the achievement of the ICB's strategic objectives.
- 1.3 Following the completion of Mersey Internal Audit Agency's (MIAAs) Phase 1 review of the ICB's Assurance Framework in December, a brief update on the recommendations made and follow-up action taken is provided.
- 1.4 A summary of risks held on the ICB's Operational Risk Register (ORR) which meet the threshold for corporate oversight and currently held at a risk score of "20" or above, are also summarised within the report, in accordance with the ICB's Risk Management Policy and reporting framework.
- 1.5 Finally, the report highlights the full review of the BAF, Strategic Objectives and risk appetite over the coming months to ensure they are aligned to the development and implementation of the ICB's strategic commissioning framework and new target operating model.

### 2. Board Assurance Framework and Strategic Objectives

- 2.1. In September 2025 members of the board reviewed and approved the ICB's fully revised BAF; the board also undertook the annual review of its risk appetite<sup>1</sup> to assess the overall level of risk it feels acceptable to tolerate in the pursuit of its objectives.
- 2.2. The revised BAF is centred around eight principal risks identified as having the potential to impact on the achievement of the strategic objectives. The strategic objectives (listed in section 2.4 below) were agreed to remain "as is" for 2025/26, in the context of the refreshed system landscape, the model ICB Blueprint and the government's three strategic shifts as outlined in the 10 Year Health Plan.
- 2.3. The eight risks are summarised below and the BAF is attached in full at Appendix 1:

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<sup>1</sup> [LSC ICB Risk Appetite Statements 2025 26 FINAL.pdf](#)



2.4. Alongside the work to develop the ICB’s strategic plans and intentions, and the transition to the ICB’s target operating model, a full review and refresh of the BAF will be undertaken in Q1 of 2026/27. This will include consideration of the ICB’s strategic objectives and the Board’s risk appetite. This is to ensure alignment with the ICB’s vision, mission and goals as a strategic commissioner and the longer-term priorities for transformation.

**Strategic Objectives 2025/26**

<b>SO1</b>	Improve quality, including safety, clinical outcomes and patient experience
<b>SO2</b>	To equalise opportunities and clinical outcomes across the area
<b>SO3</b>	Make working in Lancashire and South Cumbria an attractive and desirable option for existing and potential employees
<b>SO4</b>	Meet financial targets and deliver improved productivity
<b>SO5</b>	Meet national and locally determined performance standards and targets
<b>SO6</b>	To develop and implement ambitious, deliverable strategies

**3. Quarterly review of risks held on the BAF**

- 3.1. During the reporting period the Executives have maintained strategic oversight of all risks held on the BAF. The risks have been reviewed and updated by the relevant lead executive/s, and progress reported to the EC via monthly risk exception/dashboard reports.
- 3.2. The EC and the board’s assuring committees have also received quarterly risk management update reports for those risks which relate to the business of the committees.
- 3.3. The following tables provide a summary of the eight risks currently held on the BAF. These are reported in full at **Appendix 1**, with a succinct narrative summarising progress made since the last review by the board in September 2025:

<b>BAF-001: Strategic Commissioning</b>							
<b>If the ICB does not have a fully developed vision, strategy, intentions and implementation plans for strategic commissioning, then effective delivery of service transformation, the government ‘3 strategic shifts’ and achievement of financial sustainability will not be achieved.</b>							
Quarter/ Score	Q1	Q2	Q3 Current	Q4 Trajectory	Target Score/ Date	Risk Appetite	Linked ORR /

							<b>Statement</b>	<b>Risk level.</b>	
<b>Likelihood</b>	4	4	<b>4</b>	4	3	<b>31 Mar 26</b>	<b>Cautious</b>	<b>Low</b>	-
<b>Consequence</b>	4	4	<b>4</b>	4	4			<b>Med</b>	-
<b>Risk Score</b>	16	16	<b>16</b>	16	12			<b>High</b>	-

### Progress Made in Quarter 3:

A number of gaps in controls have been reviewed and actions completed including the development of an ICB Service Change Policy. Other developments include the establishment of a commissioning prioritisation framework, overseen through the Finance and Contracting Committee. Further progress was reported in December when the board received and supported the proposed approach and timelines for development of the ICB's 5 Year Strategic Commissioning Plan (5YSCP) at its meeting in November 2025 and a strategy session in December 2025. The model has been developed to reflect the requirements of the Strategic Commissioning Framework (SCF) within the financial parameters set. This will further support the finalisation of the draft commissioning intentions for 2026/27 which will be presented to the Board at its meeting in public in March 2026.

The risk score remains unchanged (16) at the end of Q3; the target risk score (12) is currently above the board's agreed risk appetite however, it is anticipated that as the work to finalise the medium-term commissioning plan, 5 year strategy and the refresh of the Joint Forward Plan will enable the risk to be mitigated to within the board's agreed appetite, therefore the target risk score will be reviewed in February following the national planning submission. The target risk score date is proposed to be extended to 30 June 2026 to align with the wider workforce re-development timeline.

### BAF-002: Transition to model ICB Blueprint

**If the ICB does not transition effectively and safely to a strategic commissioning organisation aligned to the ICB model blueprint whilst meeting the national directed reduction in running and programme costs from 1 April 2026, then we will not have an organisation that is able to fulfil its statutory responsibilities within its running and programme costs.**

Quarter/ Score	Q1	Q2	Q3 Current	Q4 Trajectory	Target Score/ Date	Risk Appetite Statement	Linked ORR / Risk level	
<b>Likelihood</b>	5	5	<b>5</b>	5	<b>31.3.2027</b>	<b>Cautious</b>	<b>Low</b>	-
<b>Consequence</b>	4	4	<b>4</b>	4			<b>Med</b>	-
<b>Risk Score</b>	20	20	<b>20</b> ↓ (16)	16			12	<b>High</b>

### Progress Made in Quarter 3:

Staff roadshows were held in October on the ICB's proposed operating model and functional responsibilities. Following the appointment and commencement in post of the new ICB Chief Executive Officer, the consultation process for the Executive Team re-structure was held; following this one substantive appointment was made and three posts are currently being recruited to.

The approach to the development of the ICB's new target operating model was presented to the board at its closed meeting on 18 December which was supported and will be further progressed through the Executive team in January 2026.

The Executive Team is continuing to work through the implementation and workforce transition to the new operating model, ensuring that mitigations are in place to address outstanding risks and issues and that emerging risks are captured. This will be further supported following the establishment of a Transition Planning Group and transitional planning framework to ensure that business critical tasks for the 2025/26 financial year are effectively managed, and business continuity is maintained.

As the ICB transitions to a strategic commissioning organisation and the target operating model, the ICB's workforce requirements will be finalised in line with national running cost requirements. Any emerging risks relating to workforce capacity and capability will be reviewed by the Executive Team through structured business and continuity risk assessments to ensure delivery of statutory functions is maintained, and the ICB's operating model is within the financial envelope available.

The current risk score is proposed to reduce to "16" in line with the actions completed and the forecast trajectory at Q3; the target risk score (12) is also anticipated to be achieved before the projected date of 31 March 2027 with a revised date of 30 October 2026 proposed.

The target risk score is currently held above the board's agreed risk appetite therefore, a further review of the actions to mitigate the risk is underway to determine whether any further mitigations can be applied to further reduce the target risk score.

**BAF-003: Sustainable Workforce**

**If the ICB fails to effectively support the workforce through change and develop an effective workforce structure, then the workforce capacity and/ or capability may not be sustainable to support delivery of the ICB's statutory duties, strategies and plans as outlined in the model ICB blueprint.**

Quarter/ Score	Q1	Q2	Q3 Current	Q4 Trajectory	Target Score/ Date	Risk Appetite Statement	Linked ORR/ Risk level
Likelihood	4	4	4	4	31.3.2026	Open – Seek	Low
Consequence	4	4	4	4			Med
Risk Score	16	16	16	16			High

**Progress Made in Quarter 3:**

A programme of work to support staff and organisational development (OD) is in place with six OD workstreams established. These are focused on high-priority areas to support the ICB's strategic goals and People Plan and are designed to deliver measurable improvements in organisational culture and performance and support the implementation of a robust, focused OD plan

A range of resources are available for all staff to support them through the change process, including self-guided tools, recorded webinars and facilitated sessions to support staff wellbeing and resilience alongside bespoke support for individuals and teams if required.

Actions planned to mitigate gaps in controls relating to clinical workforce development have been strengthened, including working with Higher Education Institutions (HEIs) to support the professional development of the clinical workforce, and develop roles that offer consistent terms and conditions.

As the ICB transitions to a strategic commissioning organisation and the target operating model the IC's workforce requirements will be finalised in line with national running cost requirements. Any emerging risks in relation to specific functions and their workforce capacity will be captured under **BAF-002** and reviewed through the Transition Committee.

The current risk score (16) remains unchanged at the end of Quarter 3 and is expected to remain at the current level whilst the work to transition to the new operating model is delivered. The target risk score is within the board's agreed risk appetite range however, a request to extend the target risk date from 31 March until 30 June, has been proposed to align with transition timescales.

**BAF-004: Sustainable Finances**

**If the ICB fails to deliver the agreed financial plan for 2025/26, then it will not achieve its statutory financial duties**

Quarter/ Score	Q1	Q2	Q3 Current	Q4 Trajectory	Target Score/ Date	Year end	Risk Appetite Statement	Linked ORR/ Risk level	
Likelihood	4	4	4	3	2		Cautious	Low	-
Consequence	5	5	5	5	5			Med	-
Risk Score	20	20	20	15	10			High	Y

**Progress Made in Quarter 3:**

The ICB was on plan at month 7 with a reported YTD breakeven position this was however, after deploying £38.2m of £45m annualised mitigations (the YTD equivalent was £26.6m).

The ICB reviewed its risk adjusted forecast position, and as at M7 had identified a range of risks and mitigations that may result in a small gap at the end of the financial year; work continued to seek additional opportunities to deliver the break-even position.

The Finance and Contracting Committee were updated in December that the current risk score (20) remains unchanged at Quarter 3 due to the level of financial risk that needs to be managed and mitigated over the remaining six months.

**BAF-005: Achieving transformation through effective partnerships and collaborative working**

**If the ICB does not develop and maintain effective partnership and collaborative arrangements and implement an effective governance structure for partnership working, then collaborative working and shared decision making may not be enabled, and we will fail to achieve the transformation required to deliver improved health outcomes for our local population**

Quarter/ Score	Q1	Q2	Q3 Current	Q4 Trajectory	Target Score/ Date	Risk Appetite Statement	Linked ORR / Risk level	
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<b>Likelihood</b>	4	4	4	4	3	<b>31 Mar 2026</b>	<b>Cautious</b>	<b>Low</b>	-
<b>Consequence</b>	4	4	4	4	4			<b>Med</b>	-
<b>Risk Score</b>	16	16	16	16	12			<b>High</b>	-

### Progress Made in Quarter 3:

The chair, chief executive and non-executive members have undertaken a series of visits across Lancashire and South Cumbria, meeting with our Place and Partner organisations across Blackpool, Blackburn with Darwen, South Cumbria, Lancashire and Morecambe Bay. In addition, a programme of chair/chief executive and non-executive site visits to share system-wide issues and requests for MPs support have been held. Further engagement sessions with MPs for the LSC area including chair/chief executive officer 1:1 meetings with local MPs on local issues will continue as and when required.

System partnership and stakeholder collaboration and decision-making arrangements were further strengthened through the establishment of a Planning Oversight Board (POB) which will support coordination of the Medium-Term Plan engagement activity and strategy development. The ICBs Executive Committee will continue to remain apprised of operational delivery, progress, risk and mitigations via the POB.

The current risk score (16) remains unchanged at Quarter 3; the target risk score (12) is above the board's agreed risk appetite. This is under review to determine whether additional controls can be applied to mitigate the target risk score further.

### BAF-006: Quality, regulation and compliance

**If the ICB does not have a robust framework to effectively monitor and identify quality issues and have effective mechanisms in place for early identification and escalation (e.g. contract monitoring, or clinical governance frameworks), then we may not effectively recognise and respond to fundamental quality and regulatory standards in local care provision, and our duty of continued quality improvement.**

Quarter/ Score	Q1	Q2	Q3 Current	Q4 Trajectory	Target Score/ Date	Risk Appetite Statement	Linked ORR /Risk level		
<b>Likelihood</b>	4	4	4	3	2	<b>31 Mar 2026</b>	<b>Cautious</b>	<b>Low</b>	-
<b>Consequence</b>	4	4	4	4	4			<b>Med</b>	-
<b>Risk Score</b>	16	16	16	12	8			<b>High</b>	Y

### Progress Made in Quarter 3:

Further to the publication of the Model Region Blueprint, the risk has been reviewed to ensure the controls and actions reflect the differentiation between the roles and responsibilities for quality between the ICB and region.

Following clarification, the ICB will deliver quality monitoring through the contractual route, whilst region will take responsibility for grip and oversight; 2026/27 will be a transitional year to the establishment of these arrangements.

The current risk score (16) remains unchanged for Quarter 3; whilst governance and oversight systems are in place for quality within the ICB, revised improvement plans with associated quality metrics have not been agreed with the provider trusts, constraining assurance reporting.

### BAF-007: All-Age Continuing Care

**If we do not effectively implement an affordable AACC framework and deliver the enhanced controls established through the Turnaround Plan, then the ICB will not deliver its financial plan or achieve optimal efficiency through the Waste Reduction Programme savings for 2025/26 whilst maintaining quality of service.**

Quarter/ Score	Q1	Q2	Q3 Current	Q4 Trajectory	Target Score/ Date	Risk Appetite Statement	Linked ORR / Risk level		
Likelihood	4	4	4	4	4	31 Mar 2026	Cautious	Low	-
Consequence	4	4	4	4	3			Med	-
Risk Score	16	16	16	16	12			High	-

### Progress Made in Quarter 3:

Key risks and issues managed during the reporting period include financial shortfalls, workforce pressures, operational backlogs and gaps in commissioned services. These have been actively monitored through structured workstreams and regular reporting. To support and maintain the commitment to quality improvement a range control measures have been established. These include complaints monitoring, clinical audits, and feedback from appeals. Due to the pace and volume of ongoing changes, continued monitoring and review has remained in place across all teams to ensure consistency in service delivery.

The service has faced increased operational challenges during the reporting period with high staff sickness rates and vacancy rates impacting service delivery and capacity. Workforce shortages are being addressed, and staff wellbeing and support is in place. Savings gaps in the Waste Reduction Programme were highlighted; weekly reviews are held to monitor progress and new schemes are underway to close the financial gap as far as possible.

The risk score remains unchanged Quarter 3; the target risk score is currently held above the board's agreed risk appetite; this has been reviewed by the lead executive and no change is currently proposed.

### BAF-008: Responsive and Resilient Health Care Services

**If the ICB does not commission clinically appropriate responsive and resilient health care services, aligned to a system wide clinical strategy, then we will not improve access, clinical outcomes and patient safety, and stabilise fragile services.**

Quarter/ Score	Q1	Q2	Q3 Current	Q4 Trajectory	Target Score/ Date	Risk Appetite Statement	Linked ORR / Risk level		
Likelihood	4	4	4	4	3	30 Jun 2026	Cautious	Low	-
Consequence	4	4	4	4	4			Med	-
Risk Score	16	16	16	16	12			High	-

### Progress Made in Quarter 3:

The draft ICB 3-year Clinical Strategy, with defined outcomes and measures co-produced by system stakeholders and clinical professionals was presented to the Executive Committee during November; the intent and ambition to the development of the strategy was presented to the board at its strategy session in December, who supported the approach. Further work will continue to be reviewed through the Executive Committee in January 2026.

Engagement to support the strategy development is planned across Q4 25/26 including wider clinical stakeholder engagement at system level, prior to final approval/ratification by the board (by June 2026).

The current risk score (16) remains static at the end of Quarter 3; As the 3-Year Clinical Strategy is interdependent with the development of the ICB's Five Year Strategic Commissioning Plans (5YSCP) to inform service transformation, a target risk score date of June 2026 has been proposed.

The target risk score is currently held above the board's approved risk appetite. A review of controls and actions to further reduce the target risk score is underway and this will be reported through the Executive Committee at the end of January for consideration.

3.4 The proposed recommendations outlined in the BAF risk updates above are summarised below for approval by the board:

- **BAF-001** Strategic Commissioning: to extend the target risk score date to 30 June 2026, to align with the timelines for the development of the ICB's Medium-Term Plan and 5 Year Strategic Commissioning Plan (5YSCP).
- **BAF-002:** Transition to model ICB Blueprint – to support the reduction in current risk score from “20” to “16” and approve the target risk score date to be brought forward from 31 March 2027 to 30 October 2026.
- **BAF-003:** Sustainable Workforce – to support the extension of the target risk score date from 31 March 2026 to 30 June 2026 to align with transition timescales.
- **BAF-008:** Resilient and Responsive Healthcare Services – to support the extension of the target risk score date to 30 June 2026 to align with the timelines for the development of the ICB's 3-Year Clinical Strategy

#### 4. Mersey Internal Audit Agency - Review of Assurance Framework

4.1 Mersey Internal Audit Agency (MIAA) completed Phase 1 of their annual review of the ICB's Assurance Framework in December 2025. The findings of the review were positive and noted:

- The structure of the BAF meets NHS requirements.
- Processes in place to update the BAF were robust.
- The BAF was visibly reviewed by the organisation, the board and Audit Committee.

4.2 There were two areas for further improvement identified which have been actioned - the review noted target risk scores which are held above the board's agreed risk appetite. These have been further reviewed by the relevant lead executive to establish whether additional controls or actions could be applied (within the resources available) to further mitigate the risks.

4.3 The review also highlighted risks where controls/assurances/gaps in controls required attention; these have been reviewed with the lead executives and where relevant more clearly defined or strengthened as required.

#### 5. Operational Risks (Corporate Oversight) rated “20” or above

5.1 Risks which are held on the ICB's ORR (corporate oversight) are those which have been assessed as having the potential to impact on the delivery of the ICB's plans and priorities and are identified through the day-to-day running of the organisation.

5.2 There are currently four risks which are held on the ORR which are scored at “20” or above and therefore, in accordance with the ICB’s risk management policy are included within this quarterly report to the board.

5.3 The four risks (summarised below) are aligned to SO1 and assurance of their management is reported to the ICB’s Quality and Outcomes Committee. The risks’ target scores are all within the board’s agreed risk appetite and risk tolerance thresholds. There are two risks\* highlighted below where the target risk score has not met the anticipated timescales therefore these are under review with the risk owner.

ORR Risks scored “20” or above

Risk ID	SO	Summary Risk Description	Current Risk Score	Target Risk Score	Target Risk Score Date	Risk appetite /tolerance
ICB026	SO1	ICB ability to meet its statutory SEND responsibilities	20	8	*31.12.25	4-10 (target score within range).
ICB029	SO1	Neurodevelopment pathways across Lancashire and South Cumbria	20	8	*31.12.25	
ICB037	SO1	Ability of the ICB to effectively identify and respond to quality and safety concerns for Primary Care	20	8	31.12.26	
ICB039 (NEW)	SO1	Court of Protection Deprivation of Liberty (CoPDoL) applications not completed in accordance with expected timeframes and court orders	20	9	1.4.26	

## 6. Next steps

6.1 Alongside the work to develop the ICB’s Medium Term Plan and 5-year strategic commissioning plan, and the transition to the ICB’s target operating model, a full review and refresh of the BAF will be undertaken in Q1 of 2026/27. This will include consideration of the ICB’s strategic objectives and the Board’s risk appetite, to ensure alignment with the ICB’s vision, mission and goals as a strategic commissioner and the longer-term priorities for transformation.

## 7. Recommendations

7.1 The board is requested to:

- **Note** the contents of the report.
- **Note** the progress made during Quarter 3 2025/26 to support the management of risks held on the BAF.
- **Review and approve** the recommendations to BAF risk scores and target risk score dates as summarised in section 3.4 of the report.
- **Note** the positive outcomes of MIAA’s Phase 1 review of the ICB’s Assurance Framework and the actions undertaken.
- **Note** those risks held on the ORR (corporate oversight) which are held at a score of 20 or above.

- **Note** the full review and refresh of the BAF, Strategic Objectives and Board risk appetite in Q1 of 2026/27.

**Debra Atkinson**  
**Company Secretary/Director of Corporate Governance**

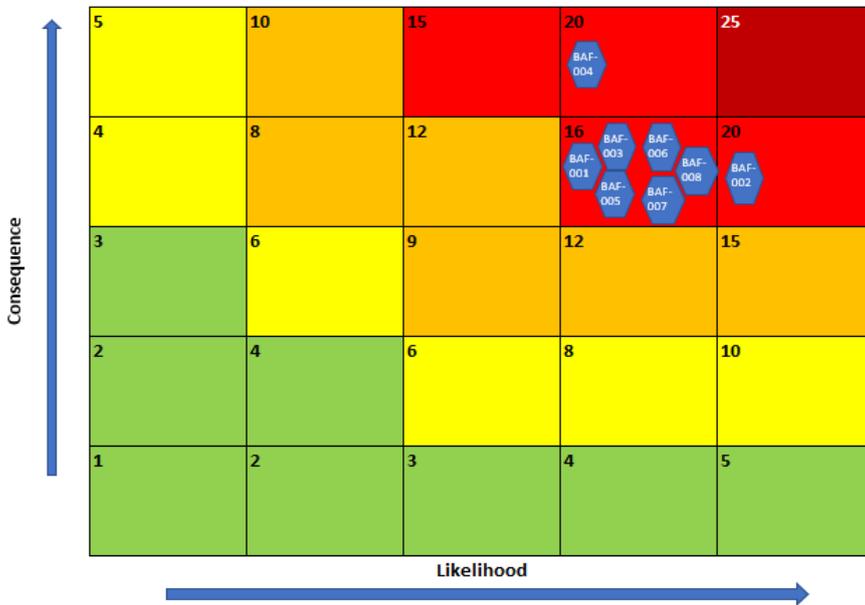
NHS Lancashire and South Cumbria Risk Management Dashboard and Full BAF risk entries

<b>SO1</b>	Improve quality, including safety, clinical outcomes and patient experience	<b>SO4</b>	Meet financial targets and deliver improved productivity
<b>SO2</b>	To equalise opportunities and clinical outcomes across the area	<b>SO5</b>	Meet national and locally determined performance standards and targets
<b>SO3</b>	Make working in Lancashire and South Cumbria an attractive and desirable option for existing and potential employees	<b>SO6</b>	To develop and implement ambitious, deliverable strategies

The ICB Board’s **Risk Appetite Statements** 2025/26 describe “the amount and type of risk the board is prepared to pursue, retain or take in the pursuit of its strategic objectives”.

[LSC ICB Risk Appetite Statements 2025 26 FINAL.pdf](#)

BAF Risks Heat Map



There are 17 risks currently held on the ICB’s Operational Risk Register that meet the threshold for corporate oversight (scoring 15 or above). These are aligned to the ICB’s SOs as demonstrated in diagram 1.