

Internal Audit Report

Getting It Right for Every Child (GIRFEC)

19 August 2025

CEJ2402

Overall Assessment	Reasonable Assurance
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This Internal Audit review is conducted for the City of Edinburgh Council under the auspices of the 2024/25 internal audit plan approved by the Governance, Risk and Best Value Committee in March 2024. The review is designed to help the City of Edinburgh Council assess and refine its internal control environment. It is not designed or intended to be suitable for any other purpose and should not be relied upon for any other purpose. The City of Edinburgh Council accepts no responsibility for any such reliance and disclaims all liability in relation thereto.

The internal audit work and reporting has been performed in line with the requirements of the Global Internal Audit Standards (UK Public Sector) and as a result is not designed or intended to comply with any other auditing standards.

Although there are specific recommendations included in this report to strengthen internal control, it is management's responsibility to design, implement and maintain an effective control framework, and for the prevention and detection of irregularities and fraud. This is an essential part of the efficient management of the City of Edinburgh Council. Communication of the issues and weaknesses arising from this audit does not absolve management of this responsibility. High and Critical risk findings will be raised with senior management and elected members as appropriate.

Executive Summary

Overall Assessment	Reasonable Assurance
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Engagement conclusion and summary of findings

GIRFEC is a multi-agency approach which requires a shared responsibility across education, health, social work, third sector partners and wider public services. This review recognises that while the Council plays a key role, outcomes can only be achieved through collaborative actions and joint accountability. Review of the design and operation of the key controls which support the Council's implementation of GIRFEC notes there is clear evidence of commitment to the GIRFEC approach and principles within the Council and particularly within Education. The following recommendations aim to support better governance and practice, stronger multi-agency working and improved outcomes for children and families:

- ensuring procedures and guidance align with 2022 policy requirements
- revising information sharing guidance and reviewing practice including use of pastoral notes in schools
- developing a training programme for colleagues and developing standard communications materials to raise awareness and support consistent engagement with children and families
- enhancing governance and oversight arrangements to provide ensure consistent and regular oversight of GIRFEC improvement actions.

Areas of effective practice

- Council guidelines are followed consistently by both Education and Social Work colleagues
- Child Plans are documented using the Council's standard templates and are supported by assessment of needs and detailed action plans
- there is a focus on improving services through the GIRFEC working group and core actions including a data and feedback driven process, with input across key stakeholders including parents, third sector and lead professionals
- robust quality assurance arrangements are in place led by the Education Quality Improvement Service which includes consideration of national quality indicators and GIRFEC principles
- a pilot for a new Child Planning format took place between August 2024 and February 2025 is due to go live in August 2025
- there are plans to develop professional learning resources including a multi-agency professional learning calendar and learning and development strategy and multi-agency key performance indicators
- risks associated with GIRFEC are noted on divisional risk registers with clear actions including updating procedures.

Audit Assessment

[See Appendix 1 for Control Assessment and Assurance Definitions](#)

Audit Area	Control Design	Control Operation	Findings	Priority Rating
1. GIRFEC Procedures			Finding 1 – Review of GIRFEC Procedures and Guidance	Medium Priority
2. Application of GIRFEC Principles			Finding 2 – Information Sharing Guidance and Practice	Medium Priority
3. Governance, Performance and Improvement			Finding 3 - GIRFEC Training and Awareness	Medium Priority
			Finding 4 – Governance and Oversight	Medium Priority

Background and Scope

Getting It Right For Every Child ([GIRFEC](#)) is a Scottish Government framework designed to improve the wellbeing of children and young people in Scotland. It focusses on making sure all agencies and services work together to provide all children, young people and their families with the right support at the right time and helping them to achieve their full potential.

The GIRFEC framework includes eight wellbeing indicators, known as SHANARRI: Safe, Healthy, Achieving, Nurtured, Active, Respected, Responsible, and Included. These indicators are used to assess a child's wellbeing and guide the provision of required support to promote their overall development and wellbeing.

GIRFEC is underpinned by [seven principles and values](#), and is delivered through the following three key components:

- a named person who is a clear point of contact for children, young people and families to go to for support and advice
- a shared and holistic understanding of wellbeing and a single model of how this can be considered and supported
- a single, shared and rights-based approach to planning for children and young people's wellbeing where support across services is needed, coordinated by a lead professional.

GIRFEC implementation by practitioners is supported through the [National Practice Model](#) and [Information Sharing](#) guidance which are tools to help ensure that GIRFEC core values and principles are met in an appropriate, proportionate and timely manner. This includes the creation of an individualised [Child's Plan](#). The Child's Plan should be clear on which services or people will provide support, who will be accountable for that support and the way in which it will be delivered. National guidance on the implementation of the Child Plan was issued in 2023 and refreshed GIRFEC policy and practice materials were issued in September 2022.

In January 2024, the Council established a GIRFEC Working Group which is chaired by the Head of Education (Inclusion). The Group includes

representatives from the Council, NHS and third sector and its aim is to strengthen GIRFEC practice across all partnership services and ensure information is effectively shared between partners. Measures of success for GIRFEC outcomes are detailed in the [Edinburgh Children's Services Plan](#).

Scope

The objective of this review was to assess the adequacy of design and operating effectiveness of the key controls established to ensure the Council has embedded GIRFEC processes in practice, considering GIRFEC pathways and practitioner guidance. The review focused on Education and Children's Social Work and included a review of a sample of Child's Plans. The review focused on GIRFEC processes within the Council and did not consider wider multi-agency processes.

Alignment to risk and Business Plan Outcomes

The review considers assurance in relation to the following Corporate Leadership Team risks:

- Health and Safety (Including Public Safety)
- Technology and Information
- Governance and Decision Making
- Service Delivery
- Regulatory and Legislative Compliance
- People

[Business Plan Outcomes](#): Attainment, achievement, and positive destinations are improved for all with a particular focus on those in poverty.

Reporting Date

Testing was undertaken between November 2024 and July 2025. Audit work concluded on 11 August 2025, and the findings and opinion are based on the conclusion of work as at that date.

Findings and Management Action Plan

Finding 1 – Review of GIRFEC procedures and guidance

The current Practitioners Guidance for GIRFEC was developed in January 2018. The Scottish Government (SG) issued a revised [GIRFEC Policy Statement](#) and supporting guidance in 2022. The Council's guidance has not yet been updated to reflect this. Key changes reflected in the revised policy statement and supporting guidance include:

- further clarity to provide confidence for practitioners in delivering GIRFEC through a policy, legislative and practice context
- alignment to key policy areas, for example: The Promise and a continued commitment to eradicate child poverty
- an emphasis on building trusting relationships and being transparent with children, young people and families, and
- renewed emphasis on multi-agency working and collaboration providing more clarity on information sharing for third sector organisations, and considering smaller, voluntary and community organisations that play a valuable role in sharing information to support a child or young person's wellbeing

Multi-agency working is referred to within the guidance, however it is at a high level and could be enhanced to provide clear guidance on when to refer a child, procedures for the exchange of files between schools and information sharing arrangements. Further updates are also required in relation to information sharing guidance (see Finding 2).

Finding Rating	Medium Priority
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The Council's GIRFEC Working Group has developed new multi-agency guidance which includes Practitioners Guidance, Multi-agency Procedures and Child Planning documents. Development of these has taken time due to the inherent complexity of multi-agency coordination to ensure that integrated guidance and procedures are need requirements are delivered. These were presented to the Children's Strategic Partnership on 29 July for approval.

Risks

- **Regulatory and Legislative Compliance** – inconsistent or outdated practices or interpretations particularly around core aspect such as named person, lead professional and multiagency working
- **Service Delivery / People** – failure to deliver early and effective support, delayed identification of need, and inappropriate or ineffective interventions
- **Partnership Working** – conflicting procedures leading to fragmented working and unclear roles and responsibilities.

Recommendations and Management Action Plan: Review GIRFEC procedures and guidance

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
1.1	The Council should ensure the new GIRFEC Multi-agency guidance is aligned to the key changes set out in the Scottish Government's 2022 Policy Statement and supporting	The Multi-agency GIRFEC practice guidance has been progressed via the multi-agency Children's Partnership working group and was presented to the	Corporate Director – Children, Education and Communities	Service Director, Education and Chief Education Officer	31/12/2025

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
	<p>guidance. This should also include incorporation of the Social Care Direct referral criteria into procedures once finalised. Once updated a regular review timetable should be established to ensure the guidance remains up to date and reflective of current requirements.</p>	<p>Children's Partnership in July and a further period was given for multi-agency update. It is expected to be finalised at the next Children's Partnership on 28 October 2025.</p> <p>This includes practice guidance to support practitioners to understand GIRFEC and levels of need and when to refer to Social Care Direct.</p> <p>The guidance will be a working document that will require annual review within the Children's Partnership to ensure it reflects government and local guidance and best practice.</p>		<p>Service Director Performance, Quality & Improvement & Chief Social Work Officer</p>	

Finding 2 - Information Sharing Guidance and Practice

Finding Rating	Medium Priority
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Information Sharing Guidance and practice

The Scottish Government (SG) issued GIRFEC Practice Guidance 4 - Information sharing in September 2022 which is not yet reflected in Council guidance. This includes detailed information on consent and consideration of updates to data protection legislation since 2018.

The current Council GIRFEC Practitioners Guidance (2018) requires consent for information sharing to be formally reviewed at least annually. The review should also be recorded within the Child Plan documentation.

Review of a sample of 8 schools highlighted that none were aware of this requirement at the time of the audit. Consent for information sharing had however been requested by all schools, as part of the Child's Planning meetings. The SG guidance does not mandate an annual review of consent and instead focuses on ensuring the need for consent is specific to the information-sharing circumstances and the lawful basis for sharing information.

Pastoral notes are recorded on SEEMiS and should record at each stage when information is received, what action has been taken and whether consent has been sought / received. Pastoral notes should be updated on a consistent and timely basis for all children with a Child's Plan in place. In addition,

where there are wellbeing concerns for a child, in addition to adding a Pastoral Note, a Wellbeing Concern Form should be completed and the Named Person for the child must be made aware of the concerns.

Review of a sample of 8 schools identified that at 2 schools pastoral notes were not being updated on a regular basis. Both schools were however aware of the issue and had implemented quality assurance processes.

Risks

- Service Delivery / Regulatory and Legislative Compliance** – out of date procedures and inconsistent practice leading to a lack of clarity on when and how information should be shared, potentially resulting in a failure to protect children or unnecessary breaches of privacy
- People / Health and Safety** - inconsistent or late recording of pastoral notes on SEEMiS potentially resulting in a fragmented picture of a child's situation and potentially obscuring timely intervention
- Technology and Information** – poor information sharing practices resulting in a failure to share necessary information to protect a child's wellbeing.

Recommendations and Management Action Plan: Information Sharing Guidance and Practice

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
2.1	<p>The Council should ensure that the new GIRFEC Multi-agency Guidance reflects the Scottish Government's 2022 practice guidance on information sharing and data protection. Once updated a regular review timetable should be established to ensure the guidance remains up to date and reflective of current requirements.</p> <p>This should include consideration of whether the requirement for an annual confirmation of consent</p>	<p>The Scottish Government's 2022 practice guidance on information sharing and data protection is included as an appendix to the new GIRFEC guidance and will be reviewed annually in line with the practice guidance.</p>	<p>Corporate Director – Children, Education and Communities</p>	<p>Service Director, Education and Chief Education Officer</p> <p>Service Director Performance, Quality & Improvement & Chief Social Work Officer</p>	31/12/2025

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
	for information sharing is still required. Updated requirements on consent should be communicated to all practitioners including schools.				
2.2	<p>a) Communications should be issued to all schools to remind them of the requirement to update Pastoral Notes within SEEMIS on a regular basis. It is recommended that a timescale following the meeting or incident is introduced to ensure prompt recording. The communication should remind colleagues to take appropriate action where a wellbeing concern is raised.</p> <p>b) In addition, quality assurance checks within schools should ensure that Pastoral Notes are being recorded consistently and in a timely manner.</p>	<p>a) A Communication will be issued to schools when the new GIRFEC practice guidance is launched.</p> <p>b) Quality assurance checks are in place to monitor recording on SEEMIS which includes pastoral notes. Issues will be picked up as part of the supported self-evaluation school visits by the Quality Improvement Service.</p>	Corporate Director – Children, Education and Communities	<p>Service Director, Education and Chief Education Officer</p> <p>Service Director Performance, Quality & Improvement & Chief Social Work Officer</p>	31/01/2026 31/01/2026

Finding 3 – GIRFEC Training and awareness

Finding Rating	Medium Priority
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GIRFEC training for education colleagues is delivered annually by the Educational Psychology Team and there is an e-learning module available on MyLearningHub. Completion of training is a known issue, with a recent survey in September 2024 concluding that only 27% of relevant colleagues had undertaken GIRFEC training in the last year. In addition, MyLearningHub completion rates show that only 181 colleagues have completed the e-learning module in the last 2 years. Given the volume of colleagues within associated services, this number would be expected to be higher.

In December 2024, the GIRFEC working group agreed an action to develop a professional learning calendar and produce a Learning and Development Strategy which was due to be complete in June 2025. The action tracker for the working group as at April 2025, however, highlights that a lead had not yet been allocated to take this work forward and the status of the action was noted as red. The GIRFEC working group meeting in June 2025 was cancelled. Management have advised that following approval of the new multi-agency GIRFEC guidance by the Children's Strategic Partnership, the professional learning modules will be reviewed and updated.

In January 2025, the Council commenced roll-out of a suite of Core Essential Learning Modules for colleagues. The Core Essential Learning roll-out for colleagues in schools is expected to begin in August 2025.

Awareness of GIRFEC amongst parents and carers

The survey results indicated that colleagues feel more can be done to support parents understanding of GIRFEC and in particular the role of the Named Person. They also indicated that more can be done to ensure families are consulted and that children have a good understanding of their rights. Most respondents felt this is an area where significant improvement is needed and that provision of standard information to raise awareness amongst families would be beneficial.

Feedback from recent focus groups is aligned with survey responses with parents confirming that need for parent focussed communications.

Management have advised that following approval of the new multiagency GIRFEC guidance by the Children's Strategic Partnership on 29 July 2025, parent/child versions of learning information will be produced.

Risks

- Regulatory and Legislative Compliance** - low levels of completion of GIRFEC training programmes may result in poor understanding of processes, inconsistent application and failure to meet requirements
- Service Delivery / People** – lack of or misinformation may lead to mistrust in services or a resistance to engage by parents, carers or children/young people.

Recommendations and Management Action Plan: GIRFEC Training and awareness

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
3.1	A lead officer for development of the Learning and Development Strategy and learning calendar should be identified as a matter of urgency.	The Learning and Development team have identified a lead officer and a draft learning and development strategy which will be taken to the Children's Partnership in October 2025 for agreement.	Corporate Director – Children, Education and Communities	Service Director, Education and Chief Education Officer Service Director Performance, Quality & Improvement &	30/11/2025

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
				Chief Social Work Officer	
3.2	<p>The GIRFEC Learning and Development Strategy should include a GIRFEC training programme aligned to the revised Council Multi-agency guidance and 2022 Scottish Government policy statement and supporting guidance. The strategy should consider the most effective modes of learning (online, bitesize sessions, face to face) and restrictions on school colleagues time given face to face teaching time.</p> <p>In addition, elements related to GIRFEC should be included in Core Essential Learning Modules for colleagues in schools and relevant children's services.</p>	<p>A multi-agency learning and development training directory and Learning Calendar will be established and launched in January 2026 once the practice guidance is launched.</p> <p>GIRFEC learning and development will be added to Core essential learning.</p>	Corporate Director – Children, Education and Communities	Service Director, Education and Chief Education Officer Service Director Performance, Quality & Improvement & Chief Social Work Officer	31/01/2026
3.3	<p>Completion rates for learning should be monitored closed across all relevant colleagues. This should include Head Teacher/Business Manager monitoring of individual schools with oversight from the centre.</p> <p>In addition, as part of development of the Learning and Development Strategy, the colleague survey results should be reviewed and further work undertaken to understand the reasons for non-completion and actions to overcome these.</p> <p>Given the subject area, impacts of persistent non completion should be clearly considered and appropriate escalation arrangements implemented.</p>	Completion rates for GIRFEC e-learning will be monitored via My Learning Hub with reporting to Senior Management Team performance meetings.	Corporate Director – Children, Education and Communities	Service Director, Education and Chief Education Officer Service Director Performance, Quality & Improvement & Chief Social Work Officer	31/01/2026

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
3.4	<p>A clear communication and engagement strategy should be developed to raise awareness of, and provide clear and consistent guidance on, GIRFEC and the key components across parents, carers and children/young people.</p> <p>The Practice and supporting materials should be accessible and available in different formats and languages in line with stakeholder needs.</p>	<p>A draft Communication and Engagement strategy will be presented to the Children's Partnership in October 2025; this will set out how we will engage parents, carers, and children and young people.</p> <p>We will ensure supporting materials are available in different formats and languages in line with stakeholder needs.</p>	<p>Corporate Director – Children, Education and Communities</p>	<p>Service Director, Education and Chief Education Officer</p> <p>Service Director Performance, Quality & Improvement & Chief Social Work Officer</p>	31/01/2026

Finding 4 – Oversight and Governance

Finding Rating	Medium Priority
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The GIRFEC Working Group was established in January 2024 by the Council as it recognised the importance of strengthening GIRFEC practice across all multi-agency partners and services and ensuring information is shared between partners effectively. The terms of reference for the group states it will meet every 4 weeks unless there are exceptional circumstances, however the group has met less frequently than this.

The group is responsible for leading several key improvement actions and while some actions have progressed as planned with regular updates, progress with some actions has been slow such as development of the professional learning calendar and learning development strategy, which was added to the action tracker in December 2024 with a due date of June 2025, and as at April 2025 did not have a lead officer noted or a status update.

This is a core action to address some of the issues identified in the survey including limited training completion. Provision of training is also essential in raising awareness of revised policy and statutory requirements and increasing consistency in practice. It is understood completion of this action is dependent on and has been delayed awaiting on of the new guidance, ensuring status updates are added to the tracker will ensure good governance and transparency in progress with actions.

Officers have also advised that due to the inherent complexity of multi-agency working it has been challenging to ensure consistent partner representation at meetings on a regular basis, due to limited resources to take forward work alongside other priorities which has resulted in slower progress.

Ensuring the group has sufficient representation is the responsibility of the Children's Strategic Partnership co- chaired by the Council's Chief Social Work Officer, who as part of this audit work has confirmed a commitment to support this.

Risks

- Governance and Decision Making** – infrequent meetings and incomplete action tracking leading to lack of accountability, slippage in improvement actions, or decision making based on outdated/incomplete data.

Recommendations and Management Action Plan: Oversight and Governance

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
4.1	The GIRFEC working group should aim to comply with the meeting frequency set out in its terms of reference. If it is deemed that less frequent meetings are needed, then a revised timetable should be agreed and adhered to. In addition, the terms of reference for the group should be reviewed annually to ensure it remains aligned to core priorities, objectives and decision-making authorities.	An updated Terms of Reference outlining meeting frequency will be devised.	Corporate Director – Children, Education and Communities	Service Director, Education and Chief Education Officer Service Director Performance, Quality & Improvement & Chief Social Work Officer	31/10/2025

Ref.	Recommendation	Agreed Management Action	Action Owner	Lead Officers	Timeframe
4.2	<p>The GIRFEC working group should ensure that action trackers are maintained with lead officers and status updates provided for agreed actions. Where actions are delayed there should be a clear rationale recorded and discussion of the associated impacts.</p> <p>Where a lead officer cannot be allocated for a core action, these reason for this should be escalated to senior leadership and the impacts recorded on the divisional risk register and escalated as appropriate.</p>	An updated GIRFEC action tracker with lead officers and status updates will be provided for each working group meeting.	Corporate Director – Children, Education and Communities	<p>Service Director, Education and Chief Education Officer</p> <p>Service Director Performance, Quality & Improvement & Chief Social Work Officer</p>	31/10/2025
4.3	The Children's Strategic Partnership should ensure there is adequate resource and support across partners to enable the GIRFEC Working Group to fulfil its remit and deliver agreed actions. This should include clear expectations on partner commitment and representation at the group.	A review of membership and partners commitment to progressing the working group plan will be undertaken with Key Partners prior to the next Children's Partnership meeting in October and will include identifying lead officers to take forward actions.	Corporate Director – Children, Education and Communities	<p>Service Director, Education and Chief Education Officer</p> <p>Service Director Performance, Quality & Improvement & Chief Social Work Officer</p>	31/10/2025

Appendix 1 – Control Assessment and Assurance Definitions

Control Assessment Rating		Control Design Adequacy	Control Operation Effectiveness
Well managed		Well-structured design efficiently achieves fit-for purpose control objectives	Controls consistently applied and operating at optimum level of effectiveness.
Generally Satisfactory		Sound design achieves control objectives	Controls consistently applied
Some Improvement Opportunity		Design is generally sound, with some opportunity to introduce control improvements	Conformance generally sound, with some opportunity to enhance level of conformance
Major Improvement Opportunity		Design is not optimum and may put control objectives at risk	Non-conformance may put control objectives at risk
Control Not Tested	N/A	Not applicable for control design assessments	Control not tested, either due to ineffective design or due to design only audit

Overall Assurance Ratings	
Substantial Assurance	A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.
Reasonable Assurance	There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.
Limited Assurance	Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.
No Assurance	Immediate action is required to address fundamental gaps, weaknesses or non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited.

Finding Priority Ratings	
Advisory	A finding that does not have a risk impact but has been raised to highlight areas of inefficiencies or good practice.
Low Priority	An issue that results in a small impact to the achievement of objectives in the area audited.
Medium Priority	An issue that results in a moderate impact to the achievement of objectives in the area audited.
High Priority	An issue that results in a severe impact to the achievement of objectives in the area audited.
Critical Priority	An issue that results in a critical impact to the achievement of objectives in the area audited. The issue needs to be resolved as a matter of urgency.

Appendix 2 – Areas of Audit Focus and Control Objectives

Audit Area	Control Objectives
GIRFEC Processes and Procedures	<ul style="list-style-type: none"> The Council has established GIRFEC processes and procedures, which are reviewed and updated in line with the refreshed Scottish Government guidance, and other identified areas for improvement. GIRFEC policies and procedures include references to the following key elements of the GIRFEC framework: <ul style="list-style-type: none"> Assessment against wellbeing (SHANNARI) indicators Named Person services Child's Plan, and Multiagency working Information sharing protocols and procedures have been established and agreed, in line with relevant guidance and legislation.
Application of GIRFEC principles	<ul style="list-style-type: none"> The SHANNARI principles are embedded in children's needs assessment procedures and appropriate training is given to all practitioners for application of these indicators in the assessment process. All children and young people have access to a Named Person, with clearly defined roles and responsibilities of the Named Person and clear lines of communication for children and families to raise any concern with the Named Person. Processes have been established for identifying children with additional support needs and creating a Child's Plan, where appropriate, before a referral is made to the Social Services. Where a Child's Plan has been put in place, there are procedures for monitoring the progress of the child and enabling effective multi-agency working and support arrangements.
Governance, Performance and Improvement	<ul style="list-style-type: none"> Quality assurance processes are in place to measure and monitor performance against GIRFEC principles and the Edinburgh Children's Services Plan. There are established governance arrangements to monitor and report compliance with the GIRFEC framework. There is a child-centred approach to engage with children, young people, and their families in key decisions affecting them with a two-way engagement process in place to receive complaints/feedback from children and families, to provide timely resolution and lessons learnt feeding into service improvement. Risks related to effective implementation of GIRFEC framework are identified, recorded and managed within a risk registers, and regularly reviewed to ensure appropriate mitigating actions are in place and remain effective, with escalation to divisional and directorate level risk committees, where required.