

Strategic Risks Register – Quarter 4 2020/21

Introduction

Risk Management is an essential element of corporate governance arrangements. The process of risk management allows the Council to identify, prioritise and mitigate risks which may have a negative effect on services. This is an important and underpinning process which ensures good value for money and also continuity of services.

Risks are recognised as essential management information and so contribute towards decision making. This document lists all those risks which are considered as strategic in nature – in other words those risks that could have a wide impact or require senior management control.

This Strategic Risks Register is reviewed and updated every quarter by Corporate Management Team. Risks above the line of tolerance are a priority and so are reviewed every quarter – whilst those below tolerance are reviewed once a year.

Strategic risks are by their very nature problematic and so can remain on the register for significant periods of time.

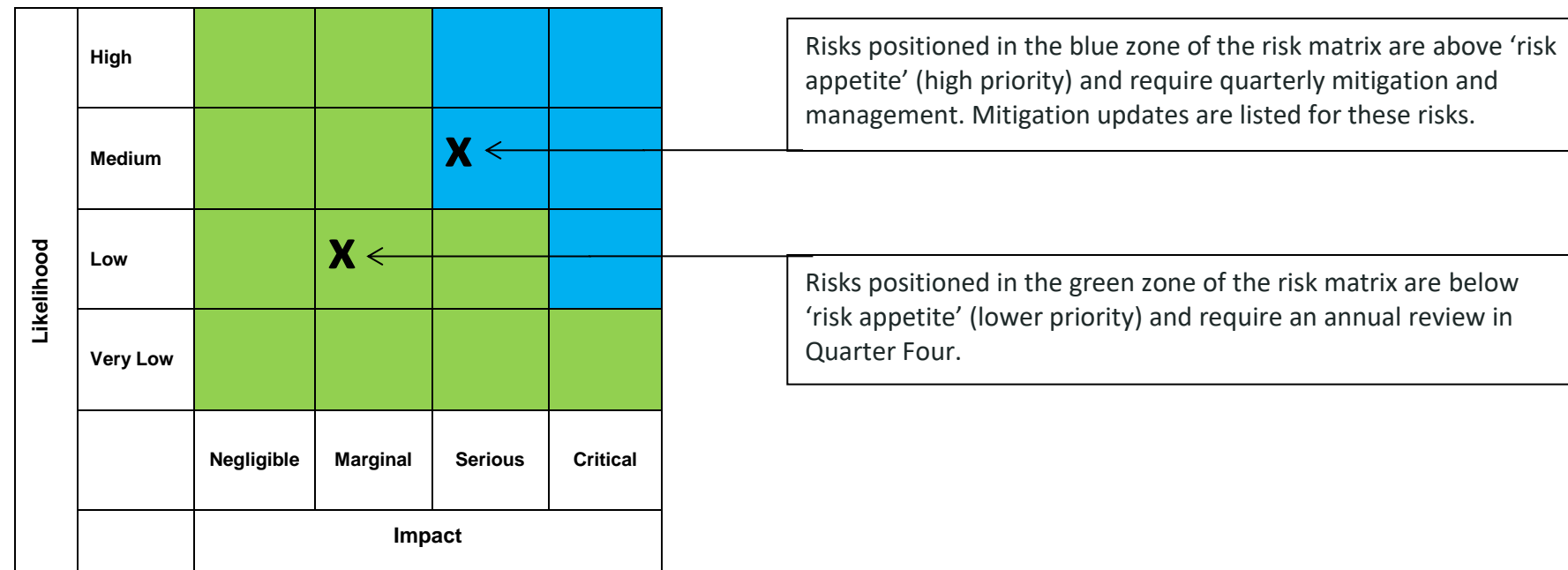
[Page 2 explains the Risk Matrix](#) with Likelihood, Impact and green/blue zones.

[Page 3 contains the 'Heat Map'](#) which shows the distribution of risk on the matrix – providing an 'at a glance' view of all risks.

[Page 4 contains the Strategic Risk Register](#)

How to understand the Risk Matrix:

This register contains the full and complete list of the Council's Strategic Risks. Each risk is plotted on a risk matrix to show degree of likelihood and impact. The greater the likelihood and impact the higher the priority for management. Those risks which lay above the line of 'risk appetite' can be seen in the blue zone of the matrix. These risks are a priority for management and are reviewed every quarter. Risks below the risk appetite, in the green zone, are a lower priority and so are reviewed on an annual basis.



Risk 'Heat Map' - showing the current position of all risks in this report

This matrix provides an 'at a glance' view of the priority risks which are positioned in the blue zone and so are above the line of risk appetite. Click on a risk to navigate to the right page.

Commentary: Following a review of the Strategic Risks for Quarter 4 2019/20 it was found that 65% of risks were above appetite. This significant change was due to the pressures brought about by Covid-19. The review this Quarter 4 2020/21 shows that improvement continues - now with 50% of risks positioned above appetite. These above appetite risks are reviewed at least on a quarterly basis.

Likelihood	High (4)			5, 13	6
	Medium (3)			9, 19, 20, 21	
	Low (2)		7	4, 14, 23	15
	Very Low (1)			8, 22	16, 17
		Negligible (1)	Marginal (2)	Serious (3)	Critical (4)
Impact					

Strategic Risk Register

The 'Heat Map' on the previous page shows the position of each risk on the matrix in terms of likelihood and impact

Risk No.	Name	Description	Risk Appetite	Review frequency	Mitigations	History of improvement	Officer Owner	Portfolio Owner
1	Income targets are not met due to ineffective debt collection	Archived	Archived	Archived		Archived during Q1 2016/17	Finance Lead Specialist	Finance and Resources
2	Contracts do not deliver the standards of performance required within the contract fee agreed	Archived. (New risk around contracts identified Q4 2019/20 - see Risk no. 23.)	Archived	Archived		Archived during Q4 2018/19	Finance Lead Specialist	Finance and Resources
3	Business Continuity	Archived	Archived	Archived		Archived during Q1 2018/19	Director of Strategy, Innovation and Resources	Leader - Promoting South Lakeland
4	Affordable housing targets are not met.	The Council will need to enable new housing particularly through private sector development. This is influenced by New Homes Bonus and Local Government Financing. During Covid-19 pandemic a temporary reduction in completions is expected - it is likely that the 2025 target will be met.	Below	Annually		Q1 2017/18: RISK POSITION UNCHANGED. Q4 2017/18: RISK POSITION UNCHANGED - retained on the register to allow regular monitoring. Q4 2018/19: RISK POSITION UNCHANGED - review indicates that housing performance is on track. Q4 2019/20: RISK POSITION UNCHANGED - review indicates housing is likely to achieve the 2025 target. Q4 2020/21: RISK POSITION UNCHANGED	Director of Customer and Commercial Services	Deputy Leader - Housing and Innovation
5	Impact of the Welfare Reform on communities	The Council mitigates as far as possible against the impacts of welfare reform. Welfare reform results in significant changes to taxes and benefits - impacting on low-income tenants and social landlords. With transfer to Universal Credit widely reported impacts on claimants across England. Central Government monitor impacts and make adjustments. The current risk position is proportionate for South Lakeland. The Council has in place many mitigations to reduce poverty and to alleviate against universal credit impacts. This risk has increased due to the Covid-19 Pandemic and mitigations have been expanded to cover Covid-19 impacts.	Above	Quarterly	The Council communicates regularly with DWP and CAB. Discretionary Housing Payment. Council Tax Reduction Scheme. Temporary Council Tax COVID -19 Hardship Fund. Council Tax Discretionary Relief Scheme. Building Financial Resilience Group - partnership working to reduce poverty. Further funding to be provided to CA To increase access to services for those residents who are experiencing financial and employment difficulties because of Covid-19 and the Government restrictions imposed as a reaction to it. To ensure those people can access the service funding provided to a project to pilot a dedicated webchat advice service. Employed additional resource to administer	Q1 2017/18: RISK POSITION UNCHANGED. Q4 2017/18: RISK POSITION UNCHANGED - risk retained whilst potential for impacts. Q4 2018/19: RISK POSITION UNCHANGED - measures to reduce poverty and alleviate against impacts now listed. Q4 2019/20: RISK POSITION INCREASED - risk increased due to Covid-19 pandemic impacts and greater dependency on Universal Credit. Q1 2020/21: RISK POSITION UNCHANGED further mitigations added. 06/08/20: Review indicates no change to risk - community impacts are being monitored. Q2 2020/21: RISK POSITION UNCHANGED whilst claimant numbers increased. Q3 2020/21: RISK POSITION UNCHANGED from Q2. Q4 2020/21: RISK POSITION UNCHANGED	Director of Strategy, Innovation and Resources	Health, Wellbeing and Financial Resilience

					the increase in HB/CTRS claims as a result of COVID-19.			
6	Medium Term Financial Planning – delivery of a balanced budget	Current and future years proposed budget reductions (expenditure and income) are not achieved. Future year's budget reductions (expenditure or income) are not identified. Significant existing income sources are not protected or effectively managed. Income from Central Government is reduced above the current assumptions. NDR income assumptions are not achieved. Other key factors are Spending Review, Business Rates Retention, Fair Funding Review and Local Government Finance Settlement. The Coronavirus pandemic presents significant income and expenditure challenges.	Above	Quarterly	MTFP assumptions reviewed, updated and reported on quarterly basis. Options to resolve issues are provided to Cabinet each quarter. MTFP review during July 2020 - completed.	Q2 2019/20: RISK POSITION UNCHANGED - risk description updated. Q3 2019/20: RISK POSITION UNCHANGED - risk description further updated. Q4 2019/20: RISK POSITION INCREASED - risk increased due to challenges of Covid-19 pandemic. Q1 2020/21: RISK POSITION UNCHANGED - mitigations reviewed. 06/08/20: Review indicates no change to risk at this time - the MTFP review is completed. Q2 2020/21: RISK POSITION UNCHANGED since recent review. Q3 2020/21: RISK POSITION UNCHANGED. Q4 2020/21: RISK POSITION UNCHANGED	Finance Lead Specialist	Finance and Resources
7	Information Management is not effective	The Council is required to have effective information governance procedures. It will be necessary to manage corporate information by implementing processes, roles and controls - including GDPR and the Data Protection and Information Security Policies.	Below	Annually	Managers are appropriately trained. Requirements in Job Descriptions and appraisals. Internal Audit findings acted on in a timely manner. Internal communication regarding policies and protocols. Review and monitoring of arrangements. Information Governance (IG) Framework in place. Continuous focus on new starters and improvement to existing procedures.	Q3 2017/18: RISK POSITION UNCHANGED - mitigation due dates updated re Information Governance Board Highlights Report 14/12/17. Q4 2017/18: RISK POSITION UNCHANGED Q4 2018/19: RISK POSITION UNCHANGED Q4 2019/20: RISK POSITION IMPROVED - risk reduced via internal communications, improved access to information, processes and data protocols. Q4 2020/21: RISK POSITION UNCHANGED additional mitigations added.	Director of Strategy, Innovation and Resources	Deputy Leader - Housing and Innovation
8	The infrastructure required to deliver the Council Plan priorities is not provided.	Infrastructure is required to support businesses and housing objectives. The Council implements the Community Infrastructure Levy (CIL) to fund infrastructure. Protocols for CIL Governance and Infrastructure Delivery Plan. The impacts of Storm Desmond may have implications for future flood resilience measures and infrastructure.	Below	Annually	Annual update of Infrastructure Delivery Plan - completed. Development of protocols for CIL Governance - completed. CIL Review proposed as part of Development Management Policies process - viability study completed.	Q4 2018/19: RISK POSITION IMPROVED - risk reduced due to greater certainty meeting infrastructure requirements. Q4 2019/20: RISK POSITION UNCHANGED. Q4 2020/21: RISK POSITION UNCHANGED	Strategy Lead Specialist	Deputy Leader - Housing and Innovation

9	Essential strategic partnerships required to deliver the Council Plan do not operate effectively.	Where necessary robust agreements are needed with opportunities and resource implications identified. Partnerships to work supportively to achieve Council Plan objectives. The introduction of local government reorganisation for Cumbria and Lancaster will require new strategic partnerships to be formed with groups to ensure communities gain maximum benefit. This risk applies to all strategic partnerships - eg Local Enterprise Partnership (LEP), CCC, LDNPA and The Bay. The risk is not specific to any one initiative or approach from partners, rather their strategic direction and policies and correlation with South Lakeland's Council Plan and the views of Central Government.	Above	Quarterly	Monitor resource, cost and reputational impact with established strategic partnerships - review with Cabinet summer 2021 following any Government decision on local government reorganisation.	Q1 2019/20: RISK POSITION UNCHANGED - SLDC continues to improve collaborative working including Morecambe Bay Health partners. The Morecambe Bay Three Authority partnerships continues to develop within the North West and Government. Q2 2019/20: RISK POSITION IMPROVED - due to improved relationships across Morecambe Bay including local authority, health partners, Local Enterprise Partnership (LEP), County Council, National Parks, Town and Parish Councils and CALC. Q4 2019/20: RISK POSITION INCREASED - due to recent devolution discussions and potential for local government reorganisation. Increased tensions felt between two tiers of government in Cumbria - all other partnerships remain positive. Q1 2020/21: RISK POSITION UNCHANGED - Morecambe Bay partnership in specific areas is strong. Covid-19 response is good example of partnership working. 'Recovery/devolution' information from central Government may lead to increased tensions for all tiers of local government in Cumbria. Q2 2020/21: RISK POSITION UNCHANGED - Q1 commentary remains relevant. Q3 2020/21: RISK POSITION UNCHANGED from Quarter 1 position. Q4 2020/21: RISK POSITION UNCHANGED.	Chief Executive	Leader - Promoting South Lakeland
10	Procurement compliance with new legislation	Archived	Archived	Archived		Archived during Q1 2016/17	Strategy Lead Specialist	Finance and Resources
11	Planning for the future of the major contracts and workload implications for support services	Archived	Archived	Archived		Archived during Q1 2016/17	Strategy Lead Specialist	Finance and Resources
12	Health and Safety management of contracts	Archived	Archived	Archived		Archived during Q4 2018/19	Chief Executive	Deputy Leader - Housing and Innovation
13	Impact of new projects and initiatives on existing Council Plan priorities	There is a risk that new projects and initiatives take the resources required by other projects and initiatives currently in the programme.	Above	Quarterly	Potential new projects and initiatives are subject to a pre-assessment to measure priority. The Commissioning Strategy will provide a robust basis for the evaluation of business cases for new projects. Council Plan priorities have been reviewed in latest version of Council Plan Feb 2021. Commissioning Strategy being worked into full practice. Response to Covid pandemic still necessitates redirection of resources.	Q2 2017/18: RISK POSITION UNCHANGED Q4 2017/18: RISK POSITION IMPROVED - likelihood reduced via controls and prioritisation against Strategic Projects Log. Q4 2018/19: RISK POSITION UNCHANGED Q4 2019/20: RISK POSITION INCREASED - increase in likelihood and impact due to recovery needs for Covid-19 pandemic. Q1 2020/21: RISK POSITION INCREASED - increase in likelihood with further awareness response/recovery needs. 06/08/20: Review indicates no change to risk. Q2 2020/21: RISK POSITION UNCHANGED due to response and recovery needs. Mitigation added re Council Plan priorities. Q3 2020/21: RISK POSITION	Director of Strategy, Innovation and Resources	Deputy Leader - Housing and Innovation

						UNCHANGED. Q4 2020/21: RISK POSITION UNCHANGED and additional mitigations added.		
14	Unintended impacts of efficiencies and service changes	New efficiencies and changes brought about by one service or organisation can have unintended negative impacts on another service – especially if proposals are not consulted on until too late in the process. Impacts can increase cost of running services. This risk is influenced by Risk 15 Customer Connect Programme.	Below	Quarterly	Managed via operational and budgeting processes. Promote early discussions on potential change with external parties. Customer Connect Programme.	Q1 2019/20: RISK POSITION UNCHANGED - risk remains unchanged during organisational change. Q2 2019/20: RISK POSITION UNCHANGED Q3 2019/20: RISK POSITION UNCHANGED - description updated. Q4 2019/20: RISK POSITION UNCHANGED - unchanged due to Covid-19 emergency response and recovery. Q1 2020/21: RISK POSITION UNCHANGED due to Covid-19. 06/08/20: Review indicates no change to risk due to Covid and budget challenges. Q2 2020/21: RISK POSITION UNCHANGED during period of organisational change and adaptation to Covid-19. Q3 2020/21: RISK POSITION UNCHANGED. Q4 2020/21: RISK POSITION IMPROVED likelihood reduced to a score of 2, risk now below appetite.	Director of Strategy, Innovation and Resources	Deputy Leader - Housing and Innovation
15	Customer Connect Programme	Customer Connect requires a significant change to ways of working. Challenges for the programme include scope and ambition, staff resources and capacity, skills and workforce planning, buy in from customers and training and development for staff and Councillors. Programme Board manages risks via the Customer Connect Risk Log. The Covid-19 pandemic increases risk to the next phase of the programme.	Above	Quarterly	Managed via the Programme Board - resources identified year 1 and 2. Programme Risk Log shared with Audit Committee each quarter. New mitigations as a result of Covid-19 have been identified and are to be included for Q1. Final reporting on Programme for January / February 2021.	Q1 2019/20: RISK POSITION UNCHANGED Q2 2019/20: RISK POSITION UNCHANGED Q3 2019/20: RISK POSITION UNCHANGED - mitigation progress updated. Q4 2019/20: RISK POSITION IMPROVED - reduced in likelihood, Programme financial benefits realised and advancements to new ways of working. 06/08/20: Review indicates no change to risk. Programme Management arrangements are resumed. Q2 2020/21: RISK POSITION UNCHANGED - mitigation added re final reporting on Programme. Q3 2020/21: RISK POSITION UNCHANGED - however risk improvement expected by March 2021.	Director of Strategy, Innovation and Resources	Deputy Leader - Housing and Innovation
16	Waste Collection – Reversing Manoeuvres	Management of waste collection vehicle manoeuvres on recycling and waste collection rounds. Practical and technological safety precautions in place: waste collection round risk assessments and safe systems of work. All drivers and crews trained. All rounds monitored to ensure safe systems are adhered to. Vehicles have advanced technologies e.g. reversing CCTV and sophisticated radar for safe manoeuvres.	Below	Annually	Safe System of Work, inspections and risk reducing technologies. Reviewed vehicle movements including reversing - findings implemented. Lane End Policy mitigates against hazardous vehicle manoeuvres. New reversing aid installed to assist safer vehicle manoeuvres.	Q4 2017/18: RISK POSITION IMPROVED - target position met due to completed mitigations. Q4 2018/19: RISK POSITION UNCHANGED Q3 2019/20: RISK POSITION UNCHANGED - new mitigation 'Lane End Policy' added. Q4 2019/20: RISK POSITION UNCHANGED. Q4 2020/21: RISK POSITION UNCHANGED	Director of Customer and Commercial Services	Health, Wellbeing and Financial Resilience
17	Cyber Security incident	High profile cyber security breaches across the World and the UK. The Council has effective security in place - however threats are becoming ever more sophisticated. Cyber-attacks can cross international boundaries and be initiated by organised criminals, individuals or states. Terrorists are conducting low-level attacks and aspire to more significant acts.	Below	Annually	Cyber security mitigations within the ICT Risk Register. Review of Insurance. Security updates, virus software updates and industry best practice. Business Continuity arrangements strengthened. Further training for all staff has been made available and accessible to all - during September 2020 re cyber security awareness.	Q2 2017/18: RISK POSITION UNCHANGED - insurance mitigation added. Q4 2017/18: RISK POSITION UNCHANGED Q4 2018/19: RISK POSITION UNCHANGED Q4 2019/20: RISK POSITION UNCHANGED Q2 2020/21: RISK POSITION UNCHANGED - mitigation added around further training for staff. Q4 2020/21: RISK POSITION UNCHANGED	Director of Strategy, Innovation and Resources	Deputy Leader - Housing and Innovation

18	Potential reduction in income from the disposal of recyclable materials as a consequence of market changes	China is now receiving only very low contaminated recycled waste. As a consequence there will be very large quantities of UK and international waste that cannot be sent to China. Without an alternative outlet the value of this waste will fall significantly. The Council's waste collection approach avoids contamination and so may be less affected. This advantage is confirmed in a recent APSE report. However income provided from waste recycling is significant and the market is currently volatile.	Archived	Annually	Legally compliant, waste recycling processes minimising contamination. Maintain high profile message to residents to avoid contamination of recyclables. Budgeting mitigations in place.	13/03/18: RISK IDENTIFIED - escalation from operational level to Strategic Risks Register. Q4 2018/19: RISK POSITION UNCHANGED - due to the lowered market value of waste. Q4 2019/20: RISK POSITION UNCHANGED - risk remains the same as market remains volatile. Q4 2020/21: RISK ARCHIVED - risk now fully managed via mitigations.	Director of Customer and Commercial Services	Climate Emergency and Localism
19	Business Continuity: Flu Pandemic - Loss of people, skills and supply chain disruption	Flu Pandemic is listed alongside the top risks in the Cumbria Community Risk Register. Covid-19 global pandemic: the Council is following Government guidelines and working with Cumbria Local Resilience Forum to safeguard the public. The Council has implemented unprecedented Business Continuity arrangements to maintain all essential services - and also to undertake activities outside its normal remit. Business Continuity is key for meeting statutory obligations and mitigations are in place within strategic and operational plans. This risk has increased due to the Covid-19 Pandemic.	Above	Quarterly	Refer to and implement National/PHE advice and guidance. Coordinate with and support comprehensive CLRF response and business continuity arrangements. Have regard to mitigations identified within the Cumbria Flu Pandemic Plan. Organisational and CLRF debriefs. New mitigations as a result of Covid-19 have been identified and are to be included for Q1. Focus on maintaining services during second wave.	13/03/18: RISK IDENTIFIED - escalation to the Strategic Risk Register. 27/09/18: Mitigations updated, BCM audit result 'Substantial Assurance'. Q4 2018/19: RISK POSITION UNCHANGED Q4 2019/20: RISK POSITION INCREASED - due to unprecedented global Covid-19 pandemic. Q1 2020/21: RISK POSITION IMPROVED - likelihood of impacts are reduced with resilient arrangements in place. Note possibility of second pandemic wave. 06/08/20: Review indicates no change to risk. Q2 2020/21: RISK POSITION UNCHANGED - due to emerging second wave and ongoing pressures. Mitigations added re maintaining services. Q3 2020/21: RISK POSITION UNCHANGED during second wave and restrictions. Q4 2020/21: RISK POSITION UNCHANGED during national restrictions.	Director of Strategy, Innovation and Resources	Leader - Promoting South Lakeland
20	Capacity for Business as Usual during the transition to the new organisational model.	Risk that vacancies are not filled for roles which are essential for running the organisation and meeting the health and welfare needs of the public. Potential impact on business whilst moving through transition to learn new processes, behaviours etc.	Above	Quarterly	Transition Planning to maintain BAU. Culture Change, Learning & Skill development planning to maintain skills and knowledge. Use of temporary resources to maintain critical posts. During transition extra temporary resources have been put in place. Review required approaching end of temporary resources.	Q1 2019/20: RISK POSITION UNCHANGED Q2 2019/20: RISK POSITION UNCHANGED - time of organisational change. Q3 2019/20: RISK POSITION UNCHANGED Q4 2019/20: RISK POSITION UNCHANGED - due to response and recovery activity for Covid-19 pandemic. Q1 2020/21: RISK POSITION UNCHANGED due to Covid-19. 06/08/20: Review indicates no change to risk. Use of temporary resources to mitigate. Q2 2020/21: RISK POSITION UNCHANGED since recent review. Mitigation added re additional temporary resources during transition. Q3 2020/21: RISK POSITION UNCHANGED. Q4 2020/21: RISK POSITION UNCHANGED, additional mitigation added.	Director of Strategy, Innovation and Resources	Deputy Leader - Housing and Innovation

21	Accountable Body for large value schemes	The Council acting as 'Accountable Body' for large value grant aided schemes. The Council acts as "the bank" for grant monies - making payments to scheme deliverers. Robust governance, project appraisal, decision making - and clarity over responsibilities and accountabilities will manage and mitigate risks. Lack of adequate governance arrangements could lead to a reduction, suspension, withholding or repayment of grant. The current capital programme contains £5.3M of ERDF flood scheme with a further £2.3M of Coastal Communities Fund, the Cross-a-Moor junction improvement scheme and Cumbria Choice Based Lettings.	Above	Quarterly	Robust governance, decisions and clarity on responsibilities and accountabilities. Partnership Agreement between partners and Council as Accountable Body. Indemnify re legal claims. Monitoring process re potential weaknesses / risks towards corrective action. Each material scheme to be in Operational Risk Registers and monitored. Audit to ensure evidence in line with document retention. Local grant recipients retain original evidence. Regular reporting for accountable body projects to Corporate Management Team.	Q1 2019/20: RISK POSITION UNCHANGED Q2 2019/20: RISK POSITION UNCHANGED Q3 2019/20: RISK POSITION UNCHANGED - reporting mitigation added. Q4 2019/20: RISK POSITION UNCHANGED - due to Covid-19 response and recovery activities. Q1 2020/21: RISK POSITION UNCHANGED due to Covid-19 - delivery timescales may be affected. 06/08/20: Review indicates no change to risk. Q2 2020/21: RISK POSITION UNCHANGED - due to uncertainty about timetable. Q3 2020/21: RISK POSITION UNCHANGED - due to uncertainties around timetable. Q4 2020/21: RISK POSITION UNCHANGED whilst some projects completeing funding agreements.	Director of Strategy, Innovation and Resources	Finance and Resources
22	Strategic documents may no longer meet post pandemic needs.	Strategic documents include for example the Local Plan and Council Plan. Change in circumstance increases uncertainty in what the Local Plan needs to address. New statistics show population increase with implications for affordable housing delivery and the Housing Strategy. This risk is due to the Covid-19 Pandemic.	Below	Quarterly	Continue to monitor socio economic and demographic indicators. Make greater use of electronic communications. Continue to engage closely with stakeholders and relevant delivery partners. Reviewed Council Plan priorities were adopted February 2021. Local Plan is in review and will take account of post Covid situation.	Q4 2019/20: RISK IDENTIFIED - due to Covid-19 pandemic. Q1 2020/21: RISK POSITION UNCHANGED - risk remains unchanged during Covid-19. 06/08/20: Review indicates no change to risk. Q2 2020/21: RISK POSITION UNCHANGED - however the Council Plan review is underway and this will reflect Covid-19 needs. Q3 2020/21: RISK POSITION IMPROVED due to greater awareness and understanding of impacts and how strategies may need to adapt. Revised Council Plan to be considered by Council in Feb 2021. Q4 2020/21: RISK POSITION IMPROVED likelihood reduced to a score of 1.	Director of Strategy, Innovation and Resources	Leader - Promoting South Lakeland
23	Significant Contracts	There is a potential risk for service provision due to the economic impacts of Covid-19. There is also the potential for budget implications.	Below	Quarterly	Communication with Governemt regarding support for providers. Maintaining close contact with providers. Services opened in July with expansion of activities for September. Mitigations in place.	Q4 2019/20: RISK IDENTIFIED - due to Covid-19 pandemic. Q1 2020/21: RISK POSITION UNCHANGED - risk remains unchanged during Covid-19. 05/08/20: Although services have opened this review indicates no change to risk due to uncertainty over future pandemic waves and restrictions. Q2 2020/21: RISK POSITION UNCHANGED - due to increasing restrictions and increased Covid-19 cases. Q3 2020/21: RISK POSITION UNCHANGED due to second pandemic wave and tiered restrictions. Q4 2020/21: RISK POSITION IMPROVED likelihood 2 reduced to a score of 2, now below risk appetite with roadmap to recovery.	Director of Customer and Commercial Services	Finance and Resources