

# Corporate Recovery Risk Register

Version 06

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Finance

Finance – Income

Mitigation Urgency Key	
IM – Immediate	Now
ST – Short Term	Within 1 month
MT – Medium Term	1 month plus
Upward arrow	Risk increasing
Downward arrow	Risk decreasing
Sideways arrow	No change in risk

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
CF01	No Government funding to replace income lost during the response phase	↓	IM	Welsh Government has made available £78m to compensate Councils for income losses in Q1 of the financial year. Our claims for quarter one have been submitted in two tranches: tranche one - £1.4m and tranche two - £0.616m. The first tranche has been settled (with the exception of net income loss for Theatre Clwyd which is now being considered separately from the new Cultural Fund with an application submitted). The second tranche is still under review. Welsh Government have also announced that a further £264m has been made available to continue to support additional costs incurred and income losses. The risk is reduced as it has been confirmed that quarterly claims for income losses can continue to be submitted for the remainder of the financial year - although eligibility details are still to be advised.
CF02	A continued loss of income in the recovery phase and beyond should public behaviour change	↔	MT	This risk will be taken into account in the current review of the Medium-Term Financial Strategy (MTFS) and reported throughout the year under monthly budget monitoring reports. Income recovery will also be included in the Portfolio Business Recovery Plans that have recently been developed.
CF03	A continued loss of income in trading services in a phased lock-down	↔	IM	As CF01 above.
CF04	A continued loss of income for Aura as Deeside Leisure Centre is retained as an emergency hospital for a prolonged period	↔	MT	All income lost to Aura at Deeside Leisure Centre (DLC) for the period from which leisure centres are allowed to re-open (from 10.08.20) but DLC is out of commission as it remains a temporary hospital, can be recovered from the Health Board under the terms of the license/commercial agreement agreed for their occupation of the facility. This protection should also apply to commercial tenants and operators. The income losses recoverable are subject to negotiation and based on physical distancing restrictions and reduced access. The negotiations are advanced.

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
CF05	An increase in the overall level of debt owed to the Council	↔	IM	Income collection continues and we actively engaging with tax-payers, tenants, customers and businesses to offer flexible arrangements. We have run two phases of 'soft enforcement' and have now resumed formal recovery procedures for Council Tax, Business Rates and Corporate Debt initially for those customers that have not paid nor engaged with the Council over several months. This risk will is being taken into account in the review of the Medium-Term Financial Strategy (MTFS).
CF19	A reduction in Business Rates collection impacts on (1) cash-flow and (2) the stability of the National Collection Pool	↑	IM	<p>The risk is tracked weekly and interventions made wherever possible through advice and support to businesses by extending payments and ensuring entitlement to grants and rate reliefs. The first and second stages of 'soft' enforcement for businesses who are falling into debt and who have not made any contact with us have been completed. As income is £3.2m less than target to achieve the same results in 2019-20, formal debt processes re-commenced in August, starting with those businesses who have not paid nor engaged with the Council and who owe several months of unpaid Non-Domestic Rates (NDR).</p> <p>Income collection continues following the issuing of statutory 1st reminder notices and by follow-up 'final' reminder notices in early September. We continue to engage with businesses to provide flexible payment agreements. However, businesses who fail to engage or pay, will now continue to be tracked and progressed through the debt recovery systems. Legal action through the Magistrates Courts will recommence in November in cases where businesses ignore repeated request for payment.</p> <p>This risk of losses in collection is also being tracked on a monthly basis by Welsh Government to 'stress-test' the resilience of the National Collection Pool as this forms a critical part of Aggregate External Finance (AEF) and the money distributed by WG through the settlement. This also includes redistributed non-domestic rates.</p>

Finance - Reserves

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
CF06	Insufficient reserves remain following the response phase	↓	IM	Our strategy is to protect an over-exposure of our reserves by maximising our claim grants to Welsh Government for refunds of additional emergency expenditure and the recovery of lost income. The latest budget monitoring position to be reported to Cabinet in September shows that there will be sufficient reserves available based on current demand and taking into account anticipated Welsh Government Funding.
CF07	Insufficient reserves impact on the financial resilience of	↓	MT	This risk is being taken into account in the review of the Medium-Term Financial Strategy (MTFS) and is impacted by CF06 above.

	the Council to sustain a lengthy recovery phase			
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Finance - Council Tax

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
CF08	A reduction in Council Tax collection impacts on (1) cash-flow and (2) annual budget	↔	IM	<p>The risk is tracked weekly and interventions made wherever possible through advice and support by extending payments or signposting to Council Tax Reduction Scheme (CTRS). The first and second stages of 'soft' enforcement for tax-payers who are falling into debt and who have not made any contact with us have been completed. As income is £1.415mm less than target to achieve the same results in 2019/20 formal debt processes recommenced in August starting with those taxpayers who have not paid nor engaged with the Council and owe several months of unpaid council tax.</p> <p>Income collection continues following the issuing of statutory 1st reminder notices and by follow-up 'final' reminder notices in early September. We continue to engage with taxpayers to provide flexible payment agreements. However, taxpayers who fail to engage or pay, will now continue to be tracked and progressed through the debt recovery systems. Legal action through the Magistrates Courts will recommence in November in cases where taxpayers ignore repeated request for payment.</p> <p>This risk is being taken into account in the review of the Medium-Term Financial Strategy (MTFS).</p>
CF09	Budget impacts of additional demand under the CTRS due to a shortfall in Government subsidy	↔	IM	<p>The impact of the additional demand is tracked weekly through Finance Tactical Group with additional demand and budget impact escalated to Welsh Government (WG). A formal decision from WG that all additional costs incurred in quarter one will be recoverable is overdue. A commitment has been made privately at Ministerial level. Negotiations continue for enhanced support from quarter two onwards.</p>
CF09a	Rise in demand for CTRS has financial impacts on the Council budget because the base subsidy from Welsh Government is not increased to meet the additional cost	↔	MT	<p>The impact of the additional demand is tracked through Finance Tactical Group with additional demand and budget impact escalated to Welsh Government (WG). Formal confirmation has now been received that all additional costs for the first quarter will be met by Welsh Government for the costs incurred in quarter one for new Council Tax Reduction Scheme (CTRS) awards (£58.5k). Negotiations continue for enhanced support from quarter two onwards with a positive response from Welsh Government.</p>



## Finance - Inflation and Markets

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
CF10	Increase in costs from suppliers for goods and services due to supply/demand and business recovery strategies	↔	MT	There is still no evidence of inflationary pressures of this type at this stage. Our normal procurement and value for money tendering exercises continue.

## Finance - Treasury Management

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
CF11	Principal investments are (1) lower rates of return due to current market instability and (2) at higher default risk	↔	IM	Investments have been made in line with our Treasury Management Strategy and primarily with the Government Debt Management Office to protect security and liquidity. The position has been reviewed and investments will now be extended to Money Market Funds, where appropriate, which will generate a higher rate of return. Current interest rates/investment returns continue to be low.
CF12	Affordability of having to borrow at an earlier stage to fund the capital programme due to lower level of reserves being held	↓	IM	Cash flow is monitored daily with accurate intelligence from across the organisation, and is reported to the Finance Tactical Group weekly. Affordability of borrowing will need to be a consideration when reviewing the profile of capital projects at later date
CF13	Clwyd Pension Fund principal investments are (1) lower rates of return due to current market instability and (2) at higher default risk	↓	IM	The Fund Investment Strategy has a diverse portfolio to spread risk. Investment profiles and options are reviewed daily with the expertise of our external advisors. Current interest rates/investment returns are low. The level of 'funded-ness' of the Fund – that is its total monetary value against total liabilities – is under threat. However, the Fund has recovered its position in recent months. This is under regular review by the Pensions Team and the external advisor team.

## Finance - Housing Revenue Account

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
CF14	Increase in rent arrears impacts on the stability of the Housing Revenue Account (HRA) Business Plan	↑	IM	We have not been able to move to evict tenants, who might then be risk of becoming homeless during the emergency response phase under Government guidance, this guidance has now been lifted. We are encouraging tenants to continue to make payments and offering a range of support to those who are struggling to pay so that we can maintain tenancies. The HRA Business Plan has been 'stress tested' for the impacts of increased arrears with optional mitigations on cost reductions. A full report is being made to Cabinet and the Community and Enterprise Overview and Scrutiny Committee. More recently Welsh Government has increased the notification period to end a tenancy from three months to six months under the Coronavirus Act 2020. This is limiting our enforcement activity and in turn puts further pressure on the rent arrears position.

## Finance - Capital Programme

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
CF15	Impact on the Capital Programme of loss of/reduction in planned Government specific grants	↓	IM	The Capital Programme and the draw-down/protection of specific grants is reported regularly to the Finance Tactical Group. There is regular liaison with Welsh Government lead contacts to protect grants for delayed/deferred schemes. Contractors for projects from Marleyfield Residential Care Home to highways construction projects are progressing with works in line with grant deadlines, and all other capital programmes have resumed e.g. Disability Facilities Grants. Works are being completed whilst strictly adhering to social distancing regulations. All grant claims have been submitted on time and there is no evidence to date of changes to existing grants. Welsh Government is making additional capital grant awards in policy areas such as economic stimulus and homelessness and we expect our capital programme to be enhanced.
CF16	Impact on the Capital Programme of any change in the appetite of the Council to borrow due to the changed economic and fiscal circumstances	↔	MT	Affordability and risk appetite are to be reviewed as part of the Medium-Term Financial Strategy. Views can then be taken on setting future year Capital Programmes together with assessments of interest rates to enable/track potential borrowing.

## Finance - Unplanned Expenditure

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
CF17	Budget instability due to the continuation of unplanned expenditure e.g. the operation of additional residential care homes and without additional Government grant	↔	MT	The first in-year budget update was reported to Cabinet in July. A full budget monitor report is being submitted to Cabinet and Corporate Resources Overview and Scrutiny Committee in September. Alternative funding options will need to be explored for these areas of expenditure if they are to be continued beyond the emergency response phase. Otherwise, they will become in-year budget pressures. No new commitments to unscheduled spend have been made in quarter two unless reported to/consented by Cabinet.

## Finance - Financial Settlements

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
CF18	Impact on the stability of the Medium-Term Financial Plan of negative Welsh Government Local Government Settlements from 2021/22 due to a change to fiscal policy as part of national recovery planning	↔	MT	Our strategy is to continue our regular engagement with Welsh Local Government Association (WLGA) and Welsh Government to gain support for sustainable settlements for the future. This is now a topical issue as we enter the period for national budget-setting.

## Workforce

## Workforce - Financial

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
CW01a	Impact on the ADMs of the introduction of tapered Government financial contributions to the ADMs under the adjusted Furlough Scheme	↓	IM	Mitigation has been successful and no new actions are needed. The Scheme has been maximised to support the businesses and their employees and claims for reimbursement are being submitted regularly. Alternative Delivery Models are factoring-in the tapering into their business plans.

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
CW02a Closed	Administration of the Welsh Government decision to make a one-off payment to care workers causes a local administrative burden and has unfunded residual costs for the Council as an employer e.g. superannuation	↓	IM	Close risk. The risk of claims has diminished as a result of changes to the scheme which now provides for payments to vulnerable groups previous excluded. By not departing from the prescribed scheme we will be able to recover all monies paid out from Welsh Government. Payments will be made to those eligible in October 2020.
CW03	Cost associated with carry forward of accrued leave across multiple leave years	↔	MT	The Working Time (Coronavirus) (Amendment) Regulations 2020 amends the Working Time Regulations 1998 to provide, where it is not reasonably practicable for a worker to take some or all of the holiday to which they are entitled, the right to carry the four weeks leave forward into the next two leave years. Many employees are continuing to take annual leave as planned/needed but it is too early to assess the extent of the potential backlog and the impacts of managing it. We may need to consider 'buying-out' some annual leave not provided for by the Regulations and this will need to be taken into account in a mid-year review of the 2020/21 Council Fund Revenue Budget. Updated guidance issued to employees is that, wherever possible, they should take a proportion of their annual leave entitlement every six months within the leave year. The reason for this is twofold, so that employees can benefit from a non-working period of rest and relaxation to keep healthy, both mentally and physically, and to limit the impact of carry forward on service delivery and associated costs.
CW05 Closed	Increase in cost from changes to sick pay policy for those whose recovery has been affected by cessation of or interruption to medical treatment	↓	MT	Close risk. The estimated number of eligible employees after an initial assessment is 25. This risk will be taken into account in our planning for the return of the workforce and in a mid-year review of the 2020/21 Council Fund Revenue Budget. Only two applications for extension to sick pay have been made to date.

Workforce - Capacity

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
CW06 Closed	Insufficient availability of occupational work groups to restore services	↓	IM	Close risk (as we have resumed services). 98.6% of the workforce are in work/available for work and there is no immediate risk. Mitigation has been successful during the response phase.

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
CW07	The operational impacts of managing high levels of accrued annual leave across multiple leave years	↓	MT	The Working Time (Coronavirus) (Amendment) Regulations 2020 amends the Working Time Regulations 1998 to provide, where it is not reasonably practicable for a worker to take some or all of the holiday to which they are entitled, the right to carry the four weeks leave forward into the next two leave years. This risk will need to be taken in account in our planning for the return of the workforce. Many employees are continuing to take/plan annual leave as planned/needed but it is too early to assess the extent of the potential backlog and the impacts of managing it.
CW08a	The availability and responsiveness of the regional antigen testing service to support the health and resilience of the workforce	↓	IM	The regional plans make provision for sufficient antigen testing and the testing systems are sufficiently reliable for us an employer.
CW09	Excessive and unsustainable demands for deployment to the regional Test, Trace and Protect (TTP) Programme depletes the workforce and compromises the resumption of full council services	↓	IM	The business case for the new employment model has been approved by Welsh Government and the new workforce are being appointed from early September to mitigate this risk of an over-reliance on our core workforce to provide a Trace Test Protect (TTP) service (refer to the July Cabinet report).
CW09a Closed	Inadequate funding availability from Welsh Government to support a regional TTP Programme	↓	IM	Risk Closed (as full grant approved by Welsh Government).
CW09b Closed	Failure to secure partner agreement across the six local authorities and the Health Board to enter into a single regional TTP programme	↓	IM	Risk Closed. All five partner authorities are fully supportive and returned an initial letter of commitment. An Inter Authority Agreement (IAA) has since been signed. An IAA binds the partners by agreement. The Health Board is fully supportive as our regional partner.

**APPENDIX 1b**

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
CW09c	The impacts on workforce planning of the unavailability of antibody testing	↓	IM	Antibody Testing for key workers will be available in the future. Antibody testing is not critical for workforce planning and has limited benefits for workforce planning as it is not a reliable/proven determinant of immunity to COVID-19.
CW10	Impacts of a second wave in the pandemic on the continuous availability of key workers to operate services in a second response phase	↔	MT	This remains an open risk. Subject to order fulfillment, the flu vaccine will be offered to all key workers. The procurement of sufficient supplies will result in a budget pressure of £25-30k. As a management action this a good investment to protect our workforce.
CW11	Increase in demand for Occupational Health and supplementary services	↔	MT	This risk is being taken in account in our planning for the return of the workforce. Additional capacity may need to be acquired and this will need to be taken into account in a mid-year review of the 2020/21 Council Fund Revenue Budget. A Psychological support and Trauma group is established and additional counselling resource is on offer for self-referrals. The cost estimate is £8k for 12 weeks. This will be a budget pressure.
CW12	Impact of changes to service performance/continuity from any changes to service models in the recovery phase	↔	MT	This risk is being taken in account in our planning for and following the return of the workforce particularly in trading services where future income levels are uncertain e.g. Newydd.
CW13	Increase in workforce turnover due to new competition for public sector occupational groups in the employment market and/or employees making personal life choices	↓	MT	This risk is being taken in account in our planning for and following full service resumptions.
CW14	Volatility and change in the employment market which impacts on successful recruitment to vacancies	↓	MT	This is no trend of any negative impact on recruitment. In addition, as part of controlling expenditure at a time of uncertainty over our financial resources, caused by the impact and disruption of the emergency situation, Service managers wishing to recruit to a vacancy now need to complete a business case which will then be considered by a corporate panel. Where the case is well made, and there is an imperative for the position for business continuity and service resilience, the panel will support a recruitment going ahead. This is a management action to control in-year expenditure due to the financial risks of the recovery period.

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
<b>CW20a</b> Closed	Impact on our workforce due to schools operating in a different way from September onwards.	↓	MT	Risk closed for this stage (as schools have resumed successfully). This was an open risk pending a smooth resumption of school openings from September 2020.
<b>CW21</b>	Impact on the most vulnerable members of our workforce due to ongoing (1) isolation and (2) remote working	↓	MT	As per CW11 and CW17 and our strategy for a safe return to work for the workforce. This strategy is progressing well with employee being able to access some Council premises on managed rotas. Effective workforce management is supporting teams and individuals. Home working remains an open offer for vulnerable employees.
<b>CW22</b>	Impact on our workforce due to the requirement to self-isolate for up to 14 days prior to themselves or a member of their family being admitted to hospital for a medical procedure	↔	IM	Employees whose role allows it, and who are fit to work, are expected to work from home. For those who role does not allow them to work from home, they will be on 'approved paid absence'. A limited number of requests have been received to date but as the NHS starts to reschedule its non COVID related activity, this could increase. We will continue to monitor requests.
<b>CW23</b>	Impact on our workforce as a result of having to quarantine for 14 days on return to the UK from none exempt countries or territories	↔	IM	Employees who booked their holiday before the Government announced rule changes for international travel and self-isolation (quarantine), where the holiday cannot be cancelled or deferred without incurring financial cost to (evidence will be required) will be expected to work from home during any period of quarantine, be redeployed to other work that can be undertaken from home, or whether special paid leave will need to be granted to cover the period of quarantine. Anyone who is intending to book a holiday outside of the UK, will need to obtain permission for the full period of absence, including any period of self-isolation and how the additional time off for the quarantine period will be covered if they are unable to work from home i.e. mixture of flexi / unpaid leave, annual leave. So that we can risk assess on a case by case basis the potential impact, all employees will have to complete a declaration form that provides details of their journey, contact details and the address where they will self-isolate, should this be necessary on return to the UK. Current Foreign & Commonwealth Office (FCO) restrictions should limit the impact on our workforce and are subject to change.

### Workforce – Health & Wellbeing

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
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Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
<b>CW15 Closed</b>	The resilience of senior and supporting management following a long and demanding response phase	↓	IM	Risk closed.
<b>CW16</b>	Increased sickness absence both COVID and non COVID related	↓	ST	Sickness absence is being managed through the Council's Attendance Management policy and procedure. Current levels of sickness absence are running at below seasonal averages for past years. Also see CW17.
<b>CW17</b>	Increased numbers of mental health related absences	↓	IM	A Wellbeing and Trauma Support Task Group is established to support the workforce in Social Services (as the highest risk service area) to manage their mental health during the pandemic. We continue to provide online training / advice and support to managers and their teams and to signpost to support from outside agencies. An Operational Task Group is now established with the role to ensure that all workplaces are safe to return to, and to communicate the measures in place to manage employee anxiety over a return to work. Links to a number of helpful websites / webinars on health and well-being to be provided via Human Resources and the Infonet.
<b>CW18</b>	Impact of deferred medical events – ability of employees to return to work within previously agreed timescales	↔	IM	Deferred medical events are being re-scheduled. Where delays have resulted in extended absence which has impacted on sick pay entitlement, measures are in place to extend pay for up to three months. Only two requests for extension to sick pay have been made to date.
<b>CW19 Closed</b>	Impact of delayed bereavement leave – on attendance and mental health	↓	MT	Risk closed.

## Governance

### Governance - Information and systems

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
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CG01	Cyber-attack through bogus Covid-19 email	↓	IM	Risk is being mitigated through the use of mail scanning tools and staff education. The likelihood of the risk can be mitigated but the impact will remain as significant due to the potential disruption to services.
CG02	Loss of data or system hack due to malware or the use of unauthorised apps	↓	IM	The security measures that we have in place in order to achieve PSN compliance continue to mitigate the risks.
CG03	Data loss or inaccuracy due to disrupted ways of working	↓	IM	Current policy, practice and controls continue.
CG04	Diversion of resource to emergency management response and recovery work delays implementation of key digital and infrastructure projects	↔	MT	The response to the emergency situation has placed peaks in demand on the ICT Service as new ways of working and supporting technologies have been introduced. It has raised the profile of the ICT Service and the benefits that can be achieved through digitisation and effective use of technology which will have long term benefits for the organisation.
CG05	Loss of functional capacity due to the inability to use mass 'roll-out' of tools on devices being used at home	↔	MT	A potential technical has been identified in principle to enable the deployment of software and upgrades without compromising security to Flintshire devices whilst being used at home. The solution is being thoroughly tested to ensure its suitability.

Governance - Governance and Control Recovery

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
CG06 Closed	Resumption of democratic processes reduces our capacity to support recovery work	↓	IM	Risk closed (as full resumption is planned for September0.
CG07	Legal challenge to a decision made under temporary remote working legislation on the grounds of insufficient process/a lack of transparency	↓	IM	This risk continues to be managed by ensuring that we comply fully with Welsh Government regulations for the emergency period, and by following recognised good/required practice in meeting management e.g. publication of agendas, reports and minutes, due notice being given of meetings, only urgent items being taken forward for decision etc
CG08	Emergency legislation is repealed prematurely and	↓	IM	Welsh Government (WG) has agreed to permanently enact some of the current emergency changes to legislation. WG has agreed to monitor the infection rates and impact on local government when current emergency legislation is due to expire with a view to lobbying for an extension in its period of effect

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
	before we are ready to resume normal services			
CG09	Technology and/or the functioning of remote meetings impedes inclusive and effective decision-making	↓	IM	Meetings are able to proceed using video conferencing or telephone connections
CG10	Technology failure during member meeting prevents or undermines inclusive and effective decision-making	↓	IM	This will always remain a risk dependent upon the IT connection of every participant. However, if necessary, meetings can be adjourned and alternative telephone facilities are always available as a back-up
CG12 Closed	Changes to established managerial and democratic systems results in challengeable decision-making	↓	IM	Risk closed (as CG07 above).
CG13	Changes to established managerial and democratic systems result in failure to properly authorise a decision	↓	IM	As CG07 above.

## Previously Closed Risks

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
CW01	Impact on Council ADM subsidies of our applications for Furlough being declined by HMRC under Government guidelines and interpretation resulting in additional costs to the Council	↓	IM	-

Risk Ref.	Risk Title	Risk Trend	Mitigation Urgency	Mitigating Actions
CW02	Impacts if pressure brought to apply temporary pay uplift (10%) to staff working in critical frontline teams by other Welsh LAs or other body (WLGA, JCW): (1) workforce division (2) potential grievances and Equal Pay claims from other occupational groups and (3) Affordability	↓	MT	-
CW04	Cost associated with retrospective approval of claims for overtime and other payments (i.e. ex-gratia)	↔	MT	-
CW08b	Insufficient resilience in regional capacity operational systems to support CW08a	Risk removed due to duplication with CW08a and CW09		
CW20	Impact of school closures on working parents whose role does not allow them to work from home, or who have caring responsibilities for children or other dependents	↓	IM	-
CG11	Insufficient information availability to provide an adequate annual statement of assurance	↓	IM	-
CG14	Inability to confirm insurance cover for claims/liability arising from the Council's role in TTP	↓	IM	-

