

# STRATEGIC RISK REGISTER

December 2018



## SR1 - Funding and income is not sufficient to deliver the Council's Corporate Objectives

<b>Corporate Priority:</b> Delivering an Efficient and Modern Council		<b>Risk Owner:</b> James Deane	<b>Portfolio Owner:</b> Graeme Elliot	<b>Tolerance</b> Treating	
Inherent Probability	Inherent Impact	Inherent Risk Score	Residual Probability	Residual Impact	Residual Risk Score
4 Very Likely	4 Severe	16 Red	3 Likely	3 High	9 Amber
Consequences		Current Controls		Assurance	
<p>The Council is currently in the third year of a 4-year funding deal with MHCLG, which, subject to a fundamental policy change from Government, provides certainty over the minimum level of funding the Council can expect until April 2020.</p> <p>Government has stated that Revenue Support Grant will not continue beyond 2020 and that local authorities will be funded solely through the national redistribution of Business rates. The model for determining post 2020 funding levels will be based on assessment of need, and is currently being devised through the Government's Fair Funding Review.</p> <p>As yet there is no certainty over the level of funding that Dacorum or any other authority can expect. However, there is a strong belief across the sector that the new model will divert funding away from lower tier authorities in favour of those authorities with responsibility for the provision of social care.</p> <p>There are two major elements of risk associated with the impending change in funding methodology. Firstly, the Council must ensure that it's in a position to adapt to significant funding reductions at short notice when the new model is announced in November 2019. Secondly, the longer term funding outcome of the new methodology may threaten the sustainability of the services the Council plans to deliver in support of its Corporate Priorities.</p>		<p>The Council's Medium Term Financial Strategy and the HRA Business Plan are controls that mitigate the likelihood of this risk crystallising through the effective modelling of the future financial environment. Sound financial planning maximises the opportunity for the Council to identify funding risks in advance, and therefore grants more time for it to plan to provide its services differently in order to continue delivering its corporate priorities. The Council's sound financial planning processes, detailed below, have resulted in my reducing the inherent probability score from '4', Very Likely, to a residual probability score of '3', Likely.</p> <p>The Council's Medium Term Financial Strategy (MTFS) details the financial implications of the Corporate Plan over a five-year period. It ensures that the Council is able to forecast likely income pressures in the medium-term, and optimise the balance between its financial resources and the delivery of its priorities. The MTFS is reviewed at least annually and is approved by Full Council, thereby providing the opportunity for Members to make informed amendments to the Corporate Plan on the basis of likely funding constraints. The current version is accessible via the following link:</p> <p><a href="https://democracy.dacorum.gov.uk/documents/g1742/Public%20reports%20pack%2031st-Jul-2018%2019.30%20Cabinet.pdf?T=10">https://democracy.dacorum.gov.uk/documents/g1742/Public%20reports%20pack%2031st-Jul-2018%2019.30%20Cabinet.pdf?T=10</a></p> <p>The Council's Housing Revenue Account (HRA) Business Plan maps planned income and expenditure over a thirty-year period. Government legislation that can affect the Council's delivery of social housing is incorporated within the plan and forms the basis for informed strategic decision-making.</p> <p>The Council's reviewing of its Corporate Plan together with its Communications Strategy mitigate the impact of this risk, should it occur, by keeping residents informed of the pressures faced by the Council, and consequently by managing aspiration and expectation (detail below). On this basis, I have reduced the Impact score from '4', Severe, to '3', High.</p> <p>The Council reviews its Corporate Plan periodically to ensure that the vision for the borough remains relevant and realistic within the financial constraints outlined within the MTFS and the HRA plan. The aspirations of the Council and the community are managed through the Council's Communications Strategy both through social media, the local press and Digest.</p>		<p>The financial planning controls the Council has in place to mitigate this risk are audited annually by both Internal Auditors (Mazars) and External Auditors (Grant Thornton).</p> <p>The most recent internal audits undertaken (in May 2018) were 'Budgetary Control' and 'Benefits and Savings Realisation'. Both audits received a FULL level of assurance, which is the highest possible.</p> <p>The external auditors, Grant Thornton, most recently gave the following 'value for money' opinion within the 2017/18 year end audit of the Council: 'based on the work we performed to address the significant risk, we concluded that [the Council] had proper arrangements in place in all significant respects to ensure it delivered value for money in its use of resources.'</p> <p>These independent audit opinions provide assurance that the Council is effectively controlling the processes that will enable it to derive value for money from its available resources, and therefore to maximise the opportunity for delivering its corporate objectives.</p>	
Sign Off and Comments					
<p><b>Sign Off Complete</b></p> <p>The Provisional Local Government Finance Settlement for 2019/20, announced in December 2018, was in line with the Council's expectation and therefore consistent with the financial plans.</p> <p>2019/20 will be the fourth year of the 4-year funding deal agreed with MHCLG, and the last before the new Fair Funding Mechanism is revealed for 2020/21.</p> <p>It is anticipated that the Council's funding will continue to decrease beyond 2020, as Government has previously stated its intention to drive funding towards those authorities with responsibility for social care. The extent of these reductions cannot yet be calculated with any degree of certainty. As a result, the Council has currently taken the prudent view that reductions will continue at the same average rate as since 2010, leading to self sufficiency, i.e. no government funding, by the end of the MTFS planning period (2022/23).</p>					

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## SR2 - The Council is unable to recruit and retain the staff required to progress as a Modern and Efficient Council

<b>Corporate Priority:</b> Delivering an Efficient and Modern Council		<b>Risk Owner:</b> Sally Marshall	<b>Portfolio Owner:</b> Neil Harden	<b>Tolerance</b> Treating	
Inherent Probability	Inherent Impact	Inherent Risk Score	Residual Probability	Residual Impact	Residual Risk Score
3 Likely	3 High	9 Amber	2 Unlikely	3 High	6 Amber
Consequences		Current Controls		Assurance	
<p>The Council is currently finding it challenging to recruit and retain staff with the appropriate skills to deliver all of its services, particularly within professional areas such as Legal, Finance, Surveyors, Environmental Health, Planning and Building Control etc.</p> <p>This challenge has grown significantly over recent years – as the economy has emerged from the worst of the recession, the private sector employment market has become relatively more buoyant due to the continued constraints on public sector funding. General competition with the private sector for skilled employees is exacerbated for Dacorum by its close proximity to the higher salaries of the London market.</p> <p>This has resulted in the appointment of a number agency staff across the Council in order to maintain service delivery. The Council's increasing reliance on agency staff brings a number of specific risks:</p> <ul style="list-style-type: none"> <li>• Statutory – staff shortages can put delivery of the Council's statutory services at risk, e.g. Environmental Health, Housing repairs and Fire safety, and Building Control;</li> <li>• Resilience – the increased flexibility of agency staff leaves the Council vulnerable to higher turnover and loss of knowledge which can affect continuity of service provision;</li> <li>• Financial – the cost of agency staff is higher than for permanent staff, which is pressurising budgets in several areas across the Council.</li> </ul> <p>- Staff Morale - could be affected in areas which are carrying vacancies, due to increased workload pressure and as a result of lack of team rapport</p> <p>This challenge affects all public sector organisations within the region, and a solution is high on the agenda for county-wide working groups of which DBC is a member.</p>		<p>A programme of work has been developed to enhance our ability to recruit and retain staff:</p> <ul style="list-style-type: none"> <li>- Terms and conditions have already been reviewed in 2017/18 to develop a range of benefits within the remuneration package</li> <li>- Flexible working arrangements have been implemented at the time of moving to the Forum which provided a modern and efficient working environment</li> </ul> <p>Further measures currently being developed and implemented include:</p> <ul style="list-style-type: none"> <li>- Enhanced and expanded Graduate/apprenticeship scheme to create up to 8 new posts within areas experiencing recruitment and retention difficulties, this will be supported by a planned approach to utilising the Council's apprenticeship levy to support some of the professional training costs</li> <li>- Creation of a DBC framework for a talent management programme and succession planning approach supported by the career development plans</li> <li>- Implementation of more robust management information which will be enabled by the implementation of a new Human Resources technology system</li> <li>- Streamlining of recruitment campaigns and modernisation of recruitment web pages; further develop the use of social media platforms for recruitment.</li> <li>- Hosting of recruitment days to generate interest in high volume recruitment service areas and retain CV's for future reference to fast track the filling of vacancies</li> <li>- Establish DBC as employer of choice by presence at careers fairs, developing links with Schools, Colleges and Universities</li> </ul>		<p>A recruitment and retention Project Initiation Document has been prepared for CMT.</p> <p>The Chief Executive is the project sponsor and is holding regularly project management meetings.</p> <p>project updates will be provided to Corporate Management Team, Performance Board and Finance &amp; Resources Overview and Scrutiny Committee.</p>	
Sign Off and Comments					
<p>Sign Off Complete</p> <p>Work has been undertaken to establish the Council's position based on evidence from the Council's HR system. This work has confirmed that whilst the current recruitment market is very competitive and challenging, there are currently a small number of areas where recruitment is more difficult. The programme of projects and initiatives has been developed to address recruitment and retention should help address this situation.</p>					

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SR3 - Social media risk					
Corporate Priority:		Risk Owner:	Portfolio Owner:	Tolerance	
Delivering an Efficient and Modern Council		Sally Marshall	David Collins	Treating	
Inherent Probability	Inherent Impact	Inherent Risk Score	Residual Probability	Residual Impact	Residual Risk Score
3 Likely	3 High	9 Amber	2 Unlikely	3 High	6 Amber
Consequences		Current Controls		Assurance	
<p>“Almost nine in ten (86%) of UK adults now have internet access at home, and this is highest among those aged under 55. Facebook continues to be the largest social network service in the UK. In April 2016, it attracted a digital audience of 38.9 million (more than three-quarters of active internet users). This was larger than that of LinkedIn (21.8 million) and Twitter (20.9 million)” (Ofcom report 2016).</p> <p>By design, social media is widely accessible and offers users easy electronic communication of personal information and other content, such as news, videos and photos. With public participation and exchange of content so readily available, this introduces a certain level of risk.</p> <p>The consequences of using social media include members of the public, pressure groups or employees using DBC social media accounts to raise negative, confidential, incorrect or abusive statements/campaigns aimed at damaging the reputation of DBC. Similarly, the risk of DBC not using social media will exclude a large proportion of residents and key demographic groups including younger residents and businesses.</p>		<p>The Council monitors and protects its social media presence through a Social Media Management Platform (Social SignIn). Social SignIn provides management options for automatic moderation of abusive messages and other risk mitigation tools.</p> <p>All staff are required to read and sign up to a range of policies including:</p> <ul style="list-style-type: none"> <li>• Corporate Information Security Management Policy</li> <li>• Corporate Information Technology Security Policy</li> <li>• Data Protection Act Policy</li> <li>• Freedom of Information Policy</li> <li>• PSN/Government Connect (GSx) Acceptable Usage Policy</li> <li>• Information Security Incident Procedure</li> </ul>		<p>An audit of DBC’s internal controls in strategy and governance, training and awareness, processes and technology, found that there is a sound system of internal control designed to achieve the system objectives. (Formally audited by Mazars in 2018).</p>	
Sign Off and Comments					
<p>Sign Off Complete</p> <p>The renewed comments in the above sections reflect the position as at the end of Q3 2018/19.</p>					

# STRATEGIC RISK REGISTER

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SR4 - Cyber Attack					
Corporate Priority:	Risk Owner:	Portfolio Owner:	Tolerance		
Delivering an Efficient and Modern Council	Sally Marshall	David Collins	Treating		
Inherent Probability	Inherent Impact	Inherent Risk Score	Residual Probability	Residual Impact	Residual Risk Score
3 Likely	4 Severe	12 Red	2 Unlikely	3 High	6 Amber
Consequences		Current Controls		Assurance	
<p>At least 98 million cyber-attacks were carried out on local authorities between 2013 and 2017. 114 (29%) councils experienced at least one cyber security breach - between 2013 and 2017.</p> <p>The Council's ICT team is aware that the council's network is the subject of attempted cyber-attacks on a daily basis from a range of sources, likely to include organised crime and state operators.</p> <p>The potential consequences of a successful cyber-attack are extremely damaging to any organisation. In the public sector, cyber-attacks on NHS trusts have led to cancelled operations, including the WannaCry attack in 2017 that affected 45 NHS organisations. In 2016 Lincolnshire County Council were hit with a £1M demand following a ransomware infection. Within Dacorum, a successful and extensive cyber-attack has the potential to impair the delivery of all services to its residents. Also any successful Cyber Attack could significantly impact the Council's reputation, as residents may lose confidence in the management of electronic records.</p>		<p>The Council monitors and protects against threats with particular attention to the following, in line with the Government's Cyber Essentials direction:</p> <ul style="list-style-type: none"> <li>• Boundary firewalls and internet gateways</li> <li>• Secure configuration</li> <li>• Access control</li> <li>• Malware protection</li> <li>• Patch management</li> </ul>		<p>Adherence to National Cyber Security Centre (NCSC) Cyber Essentials (formally audited 2017); Public Sector Network (PSN) Compliance (including annual vulnerabilities assessment by approved cyber security consultancy)</p>	
Sign Off and Comments					
<p>Sign Off Complete</p> <p>The renewed comments in the sections above reflect the position as at the end of Q3 2018/19</p>					

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## SR5 - The Council will be unable to ensure that sufficient good quality and affordable homes can be delivered, particularly for those most in need

<b>Corporate Priority:</b> Providing Good Quality Homes, in Particular for Those Most in Need	<b>Risk Owner:</b> Mark Gaynor	<b>Portfolio Owner:</b> Margaret Griffiths	<b>Tolerance</b> Treating		
<b>Inherent Probability</b>	<b>Inherent Impact</b>	<b>Inherent Risk Score</b>	<b>Residual Probability</b>	<b>Residual Impact</b>	<b>Residual Risk Score</b>
4 Very Likely	4 Severe	16 Red	3 Likely	3 High	9 Amber
<b>Consequences</b>		<b>Current Controls</b>		<b>Assurance</b>	
<p>Housing costs in Dacorum are already extremely high and among the highest in the country outside of London. The impact of this is that local people (and potential new residents) face considerable difficulties accessing decent and affordable homes. This has potential risks in increased homelessness, difficulties in attracting new business and inward investment and breakdown of family support networks if people have to move away or have to stay longer in parental homes than is desirable.</p> <p>The causes for this are complex and varied, and some are outside of the Council's control, but include:</p> <ul style="list-style-type: none"> <li>• The high cost of owner occupation due to location, local income levels, market shortage and increasing demand from people moving out from London. This can mean owner occupation is well beyond the reach of a large number of local people.</li> <li>• The Private Rented Sector is not focused on providing homes of quality to those on low incomes with short 6 months tenancies and often in poor condition.</li> <li>• The planning system does not have the levers to require new homes to be built and with respect of providing affordable homes the rented product – usually affordable rent at 80% of market rent - they are too expensive for those on low incomes.</li> <li>• There are still cuts being made to the benefits systems and Universal Credit has seen a dramatic increase in the levels of rent arrears in those areas that have already had the full roll out. This will cause further difficulty for low income households to afford rent and would lead to still further homelessness.</li> </ul> <p>The key risks this raises for the Council are:</p> <ul style="list-style-type: none"> <li>• The supply of homes is unable to match demand</li> <li>• An increase in the levels of homelessness resulting from landlords in private renting seeking to maximise their rents</li> <li>• The impact of Universal Credit roll out leading to increased arrears, debt and homelessness</li> <li>• A general risk that the construction industry may not have the capacity to meet the level of demand for development</li> <li>• The HRA will not be able to access sufficient funds to fulfil the Council's programme of social rented housing</li> </ul>		<p>The Local Plan is currently under development and is likely to go out for public consultation in the summer of 2019. This will incorporate a very high level of housing growth and the plan needs to ensure that the sites are identified and are likely to be delivered in the timescales identified. There will be a strong affordable housing policy, building on the current one, which will require at least 35% affordable homes on every scheme above 10 units. The council is strengthening its expertise in Planning on robustly testing developers viability submissions. This will include no longer accepting developer arguments that the cost of land prevents or reduces the amount of affordable they can deliver – they should take account of the council's policy when agreeing the price.</p> <p>Ensuring good masterplanning of the larger sites emerging from the Local Plan will mean that they are more likely to be built out as planned and will be more attractive for potential buyers.</p> <p>The Private Housing Service in Housing, which includes Private Renting, has been reshaped and is geared up to the licensing of up to 900 Houses in Multiple Occupation and addressing issue of disrepair and harassment in the sector. It will work with and support landlords who are prepared to grant longer tenancies which will allow families more security and stability.</p> <p>There is already a new build council home programme of 370 new homes by 2022 that is just starting. The government has announced that the cap on the HRA borrowing will be ended in April 2019 and the programme will be further expanded. A full assessment of the capacity of the HRA to move to an output of around 100-200 new homes per year will be made in the very near future and will gear up for that level of delivery. This will help, though not solve, the shortage of affordable homes for rent. Housing Associations will be encouraged to include social rented homes at lower rent levels than affordable to be built as grant is now available from Homes England for this aim.</p> <p>The introduction of the Homeless Reduction Act has allowed the Council to be geared up to dealing with an increased number of homeless households with the initial aim of preventing the homelessness from happening. One important route will be working with those private landlords that have a desire to help those in housing need, and there are many, to be able to continue renting without losing income.</p>		<p>The process for setting out development delivered is through the Authority Monitoring Report. The agreed process for CIL will see an annual report setting out income due, achieved and expenditure made on agreed infrastructure. Regular reports are made as set out above in controls.</p> <p>Regular reports will also made to the Housing and Community Overview and Scrutiny Committee on new build council homes, homeliness performance, and Private Renting sector performance.</p>	

### Sign Off and Comments

Sign Off Complete

The renewed comments in the above sections capture the position as at Q3 2018/19.

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## SR6 - That the Borough does not secure sufficient investment in essential infrastructure that is required for continued and improved economic performance and housing delivery that is sustainable and fit for the future

<b>Corporate Priority:</b> Ensuring Economic Growth and Prosperity	<b>Risk Owner:</b> Mark Gaynor	<b>Portfolio Owner:</b> Margaret Griffiths	<b>Tolerance</b> Treating		
<b>Inherent Probability</b>	<b>Inherent Impact</b>	<b>Inherent Risk Score</b>	<b>Residual Probability</b>	<b>Residual Impact</b>	<b>Residual Risk Score</b>
4 Very Likely	4 Severe	16 Red	3 Likely	3 High	9 Amber
<b>Consequences</b>		<b>Current Controls</b>		<b>Assurance</b>	
<p>The provision of infrastructure such as schools, health, transport and other facilities is crucial to sustainability of the local community and economy. Its funding, however, is increasingly complex and difficult as central government moves away from direct provision and expects the development process and local partnerships to deliver it. The risk is, therefore, that new development at a scale not experienced in Dacorum since the New Town development will not be matched with the infrastructure that a healthy and thriving community depends upon.</p> <p>Failure to provide this infrastructure will have a number of damaging consequences:</p> <ul style="list-style-type: none"> <li>• a reduction in the quality of life and opportunities for people in the Borough</li> <li>• a serious constraint to economic growth with the impact on the prosperity of local people</li> <li>• reduced financial contribution to service provision through Business Rates growth</li> <li>• increased community opposition to new developments, particularly housing, on the grounds that existing infrastructure will not cope</li> <li>• damage to the image of the area, worsening of community pride and social cohesion and reputational damage to the Council.</li> </ul> <p>The provision of infrastructure such as schools, health, transport and other facilities is crucial to sustainability of the local community and economy. Its funding, however, is increasingly complex and difficult as central government moves away from direct provision and expects the development process and local partnerships to deliver it.</p>		<p>Infrastructure is provided through the development process (s106 and Community Infrastructure Levy) and elements of funding which comes from central government (increasingly through the LEP, bidding and HCC). The responsibility for some infrastructure elements is through privatised arrangements (utilities) or arms-length government agencies such as Network Rail. The ability of the Council to control these processes is limited.</p> <p>The Council is able to promote the quantum, nature and timing of growth making it more likely that the infrastructure will be delivered. It is also able to promote partnerships and use its asset base and influence to stimulate desired development. Current controls include:</p> <ul style="list-style-type: none"> <li>• Ensuring that the Local Plan (and its component elements such as site allocations, supporting policies and so on) is up to date and sets out very clearly the requirements of proposed development. This promotes sustainable development by design, access and movement, materials.</li> <li>• Working with other South West Herts councils and HCC to make a case at national level for strategically important infrastructure</li> <li>• Bidding into government funding pots such as the Housing Infrastructure Fund where possible.</li> <li>• Use of masterplanning which supports what is required to be delivered to produce sustainability on larger sites and formalising as a Special Planning Document where appropriate to give it more 'teeth'.</li> <li>• The approved Council's Community Infrastructure Levy Policy and schedule (CIL) provides for the levels of contributions that must be made by developers and the purpose for which they will be spent. This also includes an element of CIL which can be spent by local communities and act to link growth directly with infrastructure provision that local people want.</li> <li>• Operating an 'open for business' approach to how the Council deals with potential development with a presumption of making acceptable development easier to deliver by proactive advice through the planning process. Allied to this is ensuring that the development management service is capable of achieving decision making within required time limits.</li> <li>• Stimulating required growth through the Council's own regeneration activity, including the Enterprise Zone making inward investment being more likely.</li> <li>• Increasing inward investment through initiatives such as Dacorum Look no Further, Ambassadors, direct provision of business advice and a supportive approach to new development.</li> <li>• Good market intelligence through regular liaison with local employers, landowners, developers, institutional investors and land agents regarding demand and expected assistance.</li> </ul>		<p>These controls are exercised and reported within the following:</p> <ul style="list-style-type: none"> <li>• Regular reporting to the Growth and Infrastructure Group, CMT, Cabinet and Overview and Scrutiny Committee</li> <li>• Fortnightly reporting on key projects to CMT</li> <li>• Reporting to Performance Board before each Cabinet Meeting</li> <li>• A clear programme for the Local Development Framework and CIL Quarterly reporting to Overview and Scrutiny</li> <li>• Regular reporting to Cabinet</li> <li>• Adherence to the agreed performance and project management processes</li> </ul> <p>The process for setting out development delivered is through the Authority Monitoring Report. The agreed process for CIL will see an annual report setting out income due, income achieved and expenditure made on agreed infrastructure. Regular reports are made as set out above.</p>	

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- Partnership with the LEP as the main route for additional funding for infrastructure through influencing the Strategic Growth Plan (in which Hemel Hempstead and the M1 corridor is a priority) and bidding for resources for infrastructure (such as the £5M achieved for West Herts College)
- Working to create key partnerships to bring forward development capable of funding major infrastructure such as Hemel Garden Communities with the Crown Estate, St Albans and City Council, HCC, the LEP and the Enterprise Zone.

## Sign Off and Comments

Sign Off Complete

The renewed comments in the sections above reflect the situation as at the end of Q3 2018/19.

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SR7 - Uncertainty around Brexit negotiations could result in the Council facing additional demand for its services in the short- to medium-term					
<b>Corporate Priority:</b> Delivering an Efficient and Modern Council	<b>Risk Owner:</b> Sally Marshall	<b>Portfolio Owner:</b> Andrew Williams	<b>Tolerance</b> Treating		
Inherent Probability	Inherent Impact	Inherent Risk Score	Residual Probability	Residual Impact	Residual Risk Score
4 Very Likely	4 Severe	16 Red	4 Very Likely	2 Medium	8 Amber
Consequences		Current Controls		Assurance	
<p>On 23 June 2016, the UK voted, through a referendum, to leave the EU. In March 2017, the Prime Minister invoked article 50 of the Lisbon Treaty, formally notifying the European Council of the UK's intention to leave. This provided a two-year negotiation period in which to agree future ties, with the UK exiting the EU on 29th March 2019.</p> <p>The ongoing negotiations around Brexit, and in particular the risk of a 'no-deal' outcome, leaves the Council uncertain as to whether or how there may be increased demand for its services in the short-, medium-term. The Brexit negotiations pose a strategic threat to the Council primarily because there is lack of clarity over how or to what extent the outcome may threaten achievement of its corporate priorities. In the absence of more detail, the Council is, in general terms, planning to 'be prepared'. In addition, there is the possibility that the Council may be required to carry out functions under its Civil Contingencies responsibilities.</p>		<p>The Chief Executive has prepared a report to Members outlining the sector's view on where the key Brexit risks currently lie.</p> <p>The Corporate Management Team (CMT) has put Brexit negotiations as a standing item on its agenda. All service areas are represented at this meeting, and the majority of CMT members operate within county- and nation-wide professional groups. This means that the knowledge reach of the group is wide and varied, meaning that emerging issues are likely to be raised for discussion around impact as they arise.</p> <p>CMT has also ensured that all service areas revisit their Business Continuity plans to ensure that they remain up-to-date and capable of mitigating known and emerging risks.</p>		<p>The subject of Brexit has been designated as a standing item on the CMT agenda. Members will be kept advised as more information becomes available.</p>	
Sign Off and Comments					
<p><b>Sign Off Complete</b></p> <p>The comments in the above section capture the position as at the end of Q3 2018/19.</p>					