

2020/21

Appendix A – Flintshire County Council  
Annual Governance Statement  
Mid-Year Progress Update

## 1.0 What is the purpose of this document?

This document details our progress made against the actions from the assessment of Council's Corporate Governance Framework where areas of best practise and areas for further improvement were identified.

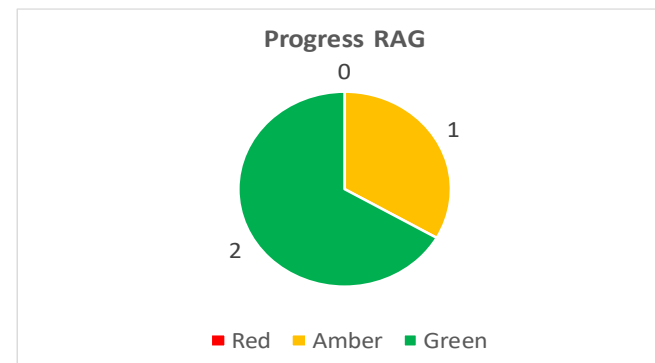
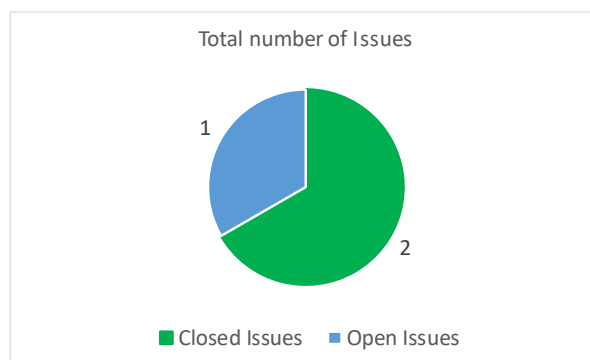
### Areas for Improvement

	Area for Improvement	Progress Update
<b>Principle B</b>	Circumstances have curtailed our ability to consult and engage, but not the willingness so to do. Further planning required following the legislation on Local Government & Elections (Wales) Act 2021.	Local Government & Elections (Wales) Act 2021 to be assessed to determine our strategy for formal and informal consultation and engagement.
<b>Principle C</b>	Although the financial sustainability of the Council has largely remained unchanged, the long term financial impact on the Council from COVID19 is currently unknown.	The Welsh Government Hardship Fund for additional costs incurred and lost income has been confirmed for the full 2021/22 financial year, although some changes have been made to eligibility criteria from 1 <sup>st</sup> October. The position for 2022/23 and beyond remains uncertain and will become clearer when the Council receives its provisional grant settlement scheduled for 21 December.
<b>Principle E</b>	Structures for public participations have still been in place, but ability to deliver has been curtailed due to the pandemic.	Local Government & Elections (Wales) Act 2021 to be assessed to determine our strategy for formal and informal consultation and engagement going forward.

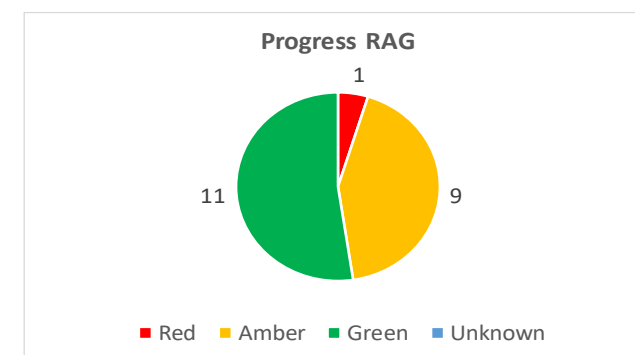
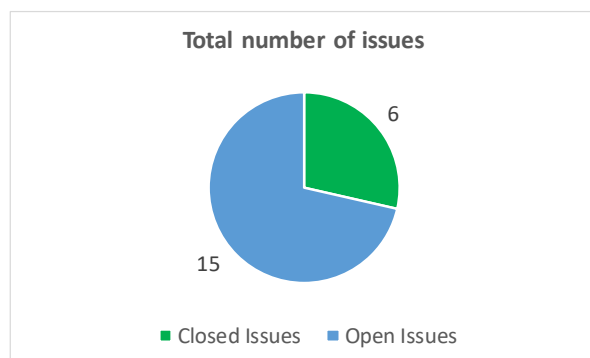
## 2.0 Dashboard overview for significant Governance and Strategic Issues for 2020/21

The charts below give a high level overview of the progress made for the areas identified of significance for Governance issues identified in the 2020/21 Annual Governance Statement and detailed in Section 3.1 and 3.2 of this report .

Governance Issues (detailed summary in section 3.1 below):



Strategic Issues (detailed summary in section 3.2 below):



### 3.1 Progress updates for significant Governance issues identified during 2020/21

The review of the effectiveness of the Council’s governance framework identified two significant internal governance issue during 2020/21. Progress updates of how the issue has been addressed and if it remains open is provided below:

Internal Council Governance issues for 2020/21	Mitigation Actions	Current Status	Progress Update	Progress RAG
<p>Defining outcomes in terms of sustainable economic, social and environmental benefits. Also carried forward from 2019/20.</p>	<p>The financial sustainability of the Council has largely remained unchanged. Furthermore the financial impact on the Council from COVID19 is currently unknown.</p>	<p><b>Closed</b></p>	<p>Whilst a draft Council Plan for 2020/21 was produced due to the response phase to the pandemic, the report never reached the democratic process for sign off and adoption.</p> <p>All Strategic reports committee reports have a section to consider Integrated Impact Assessment and Risk Management to ensure that all considerations have been given fully.</p> <p>A list of some of the evidence we have can be found below:</p> <ul style="list-style-type: none"> <li>- Council Plan Draft</li> <li>- Recovery Strategy</li> <li>- Portfolio Business Plans / recovery plans</li> <li>- MTFS – efficiency and resilience plans</li> <li>- All regularly monitored and reported</li> <li>- Member/employee workshops</li> <li>- Capital/asset planning</li> </ul> <p><b>Suggested action:</b></p> <p>Issue be closed.</p>	<p><b>G</b></p>

Internal Council Governance issues for 2020/21	Mitigation Actions	Current Status	Progress Update	Progress RAG
Using formal and informal consultation and engagement to determine the most appropriate and effective interventions /courses of action.	Circumstances has curtailed the council's ability to consult and engage, but not the willingness so to do. Further planning required following the legislation on LG & Elections (Wales) Act.	Open	Local Government & Elections (Wales) Act 2021 to be assessed to determine our strategy for formal and informal consultation and engagement. An action plan is being developed to make improvements in the coming year.  <b>Suggested action:</b> Issue be monitored and reviewed in 21/22 AGS.	A
Structures for public participations have still been in place, but ability to deliver has been curtailed due to the pandemic and could be strengthened.	As part of the digital strategy, exploring alternative ways to manage public participation digitally.	Closed	The recent transfer of Corporate Communications to Customer Contact is a step towards transforming the way we communicate using digital technology.  Opportunities to use animations, video and media platforms will be explored with the assistance of newly appointed higher level trainees to strengthen participation by members of the public.  <b>Suggested action:</b> Issue be closed.	G

### 3.2 Progress updates for significant Strategic issues identified during 2020/21?

The review of the effectiveness of the Council’s governance framework identified two significant internal governance issue during 2020/21. Progress updates of how the issue has been addressed and if it remains open is provided below:

Strategic issues for 2020/21	Current Risk Rating	Mitigation Actions	Current Status	Progress Update	Progress RAG
<b>PE03</b> - Unable to regenerate Town Centres through implementation of the Town Centre Strategy due to insufficient resources and the compound economic consequences of the emergency situation	<b>R</b>	A review is to be undertake of Town Centre Strategy	<b>Open</b>	<ul style="list-style-type: none"> <li>The strategic approach to town centre regeneration was refreshed in May 2021.</li> <li>The Council has been supporting a number of investors to develop their Town Centre projects and has been successful in securing Welsh Government funding for 3 projects to date in Buckley, Mold and Shotton.</li> <li>An interest free loan scheme for investors in Town Centres has been launched with £840K available for Flintshire. The first applications for the scheme have been received.</li> <li>A review of the street environment in Buckley Town Centre has been commissioned.</li> <li>Funding has been secured for digital footfall monitoring equipment across all of the town centres in Flintshire.</li> </ul>	<b>G</b>
<b>CF08</b> - A reduction in Council Tax collection impacts on (1) cash-flow and (2) annual budget	<b>A</b>	<ul style="list-style-type: none"> <li>Regular monitoring of the financial impact by the revenues team to track in-year collection levels and compare to previous years</li> <li>Regular liaison with WLGA contacts re escalation with Welsh Government</li> <li>Incorporation of impact on</li> </ul>	<b>Open</b>	<p>The financial support of circa £1.05m from Welsh Government to mitigate the impacts of council tax income loss in 2020/21 has helped to reduce the risk levels. Debt Recovery processes have re-commenced to increase collection rates and ongoing risks are being taken into account in the review of the Medium-Term Financial Strategy (MTFS).</p> <p>84.6% of Council Tax has been collected to date and the outturn ‘in-year’ collection rate is expected to be around 97.6% by 31<sup>st</sup> March 2022.</p>	<b>G</b>

		<p>monthly monitoring reports in 2021/22</p> <ul style="list-style-type: none"> <li>• Full Return to full debt recovery activities and collection procedures, including court prosecutions at the Magistrates Court</li> <li>• Increase in resource levels by 1 fte to support collections</li> </ul>		<p>Collection levels are currently ahead of collection levels in 2020/21 but 0.5% below pre-pandemic 2019/20 levels.</p>	
<p><b>CF14</b> - Increase in rent arrears impacts on the stability of the Housing Revenue Account (HRA) Business Plan</p>	<p><b>R</b></p>	<ul style="list-style-type: none"> <li>• Regular weekly monitoring of the financial impact by the Housing Rents team to track in-year rent collection levels and compare to previous year</li> <li>• Continued use of Mobyssoft 'Rent Sense' to identify early arrears cases to allow the team to engage with and support these tenants by signposting to the support that may be available for the payment of Housing Rents</li> <li>• Regular referral of cases to an officer led Case Review Panel to ensure all housing interventions are coordinated and cases at risk of homelessness are</li> </ul>	<p><b>Open</b></p>	<p>The continued deployment of the Mobyssoft 'Rent Sense' software, funded by the HRA, is necessary to control rent arrears and to ensure resources are targeted effectively. Legal action is being taken where it is appropriate to do so, especially in cases where tenants fail to engage.</p> <p>Resource levels are under review in the Housing Rent Income service and will need to be increased by 2 fte's to support the improvement of rent collections as part of the covid recovery strategy. In addition to this, two Accommodation Support Officers have been embedded into the Rent Income service to ensure tenants receive the right level of support at the very earliest opportunity.</p> <p>As part of the mitigation measures and to support tenants during the pandemic from March 2020, WG also introduced a package of measures to protect tenants from eviction. These measures have now been lifted but there remains, up to at least March 2022, a requirement to give an extended period of six months (instead of three months) when issuing 'Notices of Seeking Possession'. This is the statutory process we must follow before starting court proceedings for non-payment of rent.</p>	<p><b>A</b></p>

		<p>tracked by all teams</p> <ul style="list-style-type: none"> <li>• Increase of resource levels to support the work in rent income service</li> </ul>			
<p><b>CF19</b> - A reduction in Business Rates collection impacts on (1) cash-flow and (2) the stability of the National Collection Pool</p>	<b>A</b>	<ul style="list-style-type: none"> <li>• Regular monthly tracking of the financial impact by the revenues team to track in-year collection levels and compare to previous years</li> <li>• Full Return to full debt recovery activities and collection procedures, including court prosecutions at the Magistrates Court</li> <li>• Increase in resource levels by 1 fte to support collections</li> <li>• Targeted approach to identify ratepayers at risk of not meeting payment obligations</li> </ul>	<b>Open</b>	<p>Legal action through the Magistrates Courts has re-commenced in cases where businesses ignore repeated request for payment.</p> <p>This risk of losses in collection continues to be 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>	<b>A</b>
<p><b>CF20</b> - Insufficient capacity to deliver grants and rate relief whilst also recovering lost income/debts may impact debt recovery capacity</p>	<b>A</b>	<ul style="list-style-type: none"> <li>• Delivery of grants and rate relief to support businesses</li> <li>• Aim to recoup income lost during the response phase</li> <li>• Additional resource has been allocated to the service to compensate for the extra workload and</li> </ul>	<b>Closed</b>	<p>In July we reported to Recovery Committee the Corporate Risk Register and Mitigations Documents with a recommendation a number of risks were closed. CF20 was included in this list due to 'grant schemes ending and the Council no longer required to administer it'.</p>	<b>G</b>



		<p>cover staff absences</p> <ul style="list-style-type: none"> <li>Levels of grant delivery will be monitored weekly to ensure that local businesses maximize their entitlement to WG support and financial aid</li> </ul>			
<p><b>CG04</b> - Diversion of resource to emergency management delays implementation of key digital and infrastructure projects</p>	<b>A</b>	<ul style="list-style-type: none"> <li>Realignment of resources to areas of high demand to support the change of the support model for the IT Service Desk</li> <li>Reprioritisation of activities in the IT Business plan to reflect the immediate needs of the organisation</li> </ul>	<b>Closed</b>	<p>Any demands from services are just normal day to day pressures for digital development rather than a response specifically to the pandemic.</p> <p>Although the risk is now closed, there are still pressures on previously scheduled projects.</p> <p>The service is working with colleagues from across the organisation through the Digital Strategy Board to challenge and prioritise projects and whilst this does not resolve the capacity issues within the service, it does develop a common understanding of the challenge and enables a meaningful discussion around reprioritisation of work.</p>	<b>G</b>
<p><b>CG20</b> - Council Tax Collections rate reduce and Impacts on cash-flow, annual budget and Medium Term Financial Strategy (MTFS) due to suspension of debt recovery</p>	<b>A</b>	<ul style="list-style-type: none"> <li>Regular monitoring of the financial impact by the revenues team</li> <li>Interventions through advice regarding delaying payments, accessing support for residents through signposting to revenues and benefits team</li> <li>Reporting impact to Financial TCG on a weekly basis</li> <li>Regular liaison with WLGA</li> </ul>	<b>Closed</b>	<p>In September we reported to Recovery Committee the Risk allocations to OSC's and their FWP's. CG20 was identified within this as a duplicate of CF08 and was recommended for closure due to duplication.</p>	<b>G</b>

		<p>contacts re escalation with Welsh Government</p> <ul style="list-style-type: none"> <li>• Incorporation of impact on monthly monitoring reports in 20/21</li> <li>• Revised collection rate applied to MTFS forecast</li> </ul>			
<p><b>EY01</b> - Secondary schools are not financially viable due to insufficient base funding</p>	<b>R</b>	<ul style="list-style-type: none"> <li>• Licensed deficit policy revised and issued to schools</li> <li>• Challenge and support meetings with Headteacher/School Business Manager</li> <li>• Financial Performance Monitoring Group</li> <li>• Formula review</li> <li>• Local Authority approval mechanisms for recruitment</li> </ul>	<b>Open</b>	<p>There will be on-going work with secondary head teachers to review the secondary schools funding formula with eventual consultation with the Schools' Budget Forum. The Council has already invested £1m in secondary school budgets in 21-22 and the ongoing risk associated with insufficient base budgets for secondary schools is included in the MTFS.</p>	<b>G</b>
<p><b>CF05</b> - An increase in the level of debt owed to the Council.</p>	<b>A</b>	<ul style="list-style-type: none"> <li>• Regular monthly tracking of the financial impact by the revenues team to track in-year collection levels and compare to previous years</li> <li>• Full Return to full debt recovery activities and collection procedures,</li> </ul>	<b>Open</b>	<p>Income collection continues and we actively engaging with tax-payers, tenants, customers and businesses to offer flexible arrangements. We are also taking steps to enforce payment against residents and businesses who have not paid nor engaged with the Council over several months. This risk is being taken into account in the review of the Medium-Term Financial Strategy (MTFS) including a review of the adequacy of levels of bad debt provision across the Council.</p> <p>Additional funding (circa £1.05m) from WG to compensate for</p>	<b>A</b>

		<p>including court prosecutions at the Magistrates Court and County Courts</p> <ul style="list-style-type: none"> <li>Increase in resource levels by 1 fte to support collections</li> </ul>		<p>losses of 2020/21 council tax collections is helping to provide financial resilience as we work through the recovery phase.</p>	
<p><b>HA04</b> - Increased financial risk due to business failures and ability to anticipate Council Tax Refund Scheme (CTRS) due to business closure, unemployment, reduced hours of work</p>	<b>A</b>	<ul style="list-style-type: none"> <li>Regular monitoring of the number of claims and financial awards by the Benefits Team</li> <li>Reporting impact to Financial Tactical command group on a weekly basis</li> <li>Regular liaison with Welsh Local Government Association contacts re escalation with Welsh Government to raise awareness of potential budget impacts of rising levels of CTRS awards</li> <li>Incorporation of impact on monthly monitoring reports in 20/21</li> <li>Revised Council Tax Reduction Scheme awards and potential budget pressures applied to MTFS forecast</li> </ul>	<b>Open</b>	<p>No current change, following the end of the furlough scheme we have not yet seen any increased demands. This will continued to be monitored and risk adjusted if required.</p>	<b>A</b>
<p><b>HA06</b> - Impacts on</p>	<b>R</b>	<ul style="list-style-type: none"> <li>Financial monitoring -</li> </ul>	<b>Open</b>	<p>Income streams are still affected as recovery is below the pre-</p>	<b>A</b>

<p>income stream based on delayed/non recovery of housing benefit overpayment</p>		<p>Budget and Income</p> <ul style="list-style-type: none"> <li>• Contacting customers to arrange to repayment plans at a level which suits their new income</li> <li>• Offering customers support and advice to claim available benefits</li> </ul>		<p>pandemic levels.</p>	
<p><b>PE12</b> - The implications of Ash Die back on finances and reputation of the Council due to the scale of the problem and the ability to make safe Highways and Council amenity land</p>	<b>A</b>	<ul style="list-style-type: none"> <li>• Revise the timetable for planned surveys that could not be carried out whilst in lockdown</li> <li>• Established sites that will require further investigation and this will be built into future work programmes</li> <li>• Prioritised surveys on Highway Routes and other FCC land with public access and school grounds as areas that have the highest risk rating for injury or damage</li> <li>• Engage with external Legal Counsel to advise on Ash Die Back plan, Risk Assessments and inspection regime, to test for appropriateness and reasonableness</li> </ul>	<b>Open</b>	<ul style="list-style-type: none"> <li>• Two survey seasons carried out on ash adjacent to the highway to inform disease status and risk.</li> <li>• Internal Audit report (dark amber) carried out on risk and process.</li> <li>• Delivery plan to remove high risk FCC owned trees being developed.</li> <li>• Refined approach to deal with private landowner trees put in place.</li> <li>• Education &amp; Countryside sites trees surveyed with high risk trees removed.</li> <li>• Resource gap analysis to be undertaken for delivery and admin support.</li> </ul>	<b>A</b>

<p><b>ST10</b> - Increased expenditure on contract, labour, plant, vehicles and materials due to changing work patterns in response to pandemic</p>	<p><b>A</b></p>	<ul style="list-style-type: none"> <li>Regular SMT review for the most appropriate methods of delivering service in an effective and cost-effective manner following guidance</li> <li>Ensure that all government guidance is adhered to</li> <li>Monitoring and capturing all additional expenditure as a result of service changes related to COVID-19 in one place</li> </ul>	<p><b>Open</b></p>	<p>Continual review is being undertaken at fortnightly Portfolio Senior Management Team meetings on the most appropriate methods of delivering services in an effective and cost-effective manner whilst abiding by government guidance.</p> <p>Procedures are being adapted and risk assessments are being reviewed when alternative ways of working are being introduced.</p> <p>All operatives returned to substantive working patterns from 24<sup>th</sup> May 2021. Convoy vehicles were removed on a case by case basis from September 2021 reducing the demand on fleet.</p> <p>Welsh Government Covid hardship funding ended in September 2021, which had been funding convoy vehicle working and additional resources to cover sickness absence due to Covid.</p> <p>We are continuing to monitor national guidance and review business continuity plans (BCPs) on a daily basis.</p>	<p><b>A</b></p>
<p><b>ST17a</b> - Increased risk of ill health due to mental health and well-being, personal and/or family issues</p>	<p><b>A</b></p>	<ul style="list-style-type: none"> <li>All Managers / supervisors maintain contact with staff members who are off work on sick leave or have identified themselves as suffering with personal issues (bereavement; relationship separations; isolation) to ensure that appropriate support and reassurance is given through CareFirst and Occupational Health</li> <li>Managers have and continue to facilitate opportunities for employees who need to</li> </ul>	<p><b>Open</b></p>	<p>All mitigations are still in place and employed where necessary</p> <p>Individual cases are continuing to be managed closely with support through Occupational Health</p> <p>All risk assessments are being reviewed to include mental health and well-being and stress / mental health &amp; well-being has been included as a standing agenda item on the portfolio's Health &amp; Safety Committee</p> <p>We are not seeing a reduction in the number of employees off work due to stress / mental health and well-being or seeking support for such issues, hence why this risk has been kept at an amber status</p>	<p><b>A</b></p>

		<p>work in the office environment to support their personal wellbeing</p> <ul style="list-style-type: none"> <li>Occupational Health referrals are made by managers for employees who might need additional support. Employees can self-refer if they prefer</li> </ul>			
<p><b>ST28a</b> - Unable to gain regulatory approval (planning; Drainage; environmental permitting) to progress key infrastructure projects in a timely manner due to delays in processing applications</p>	<b>R</b>	<ul style="list-style-type: none"> <li>The project teams are working with regulatory bodies to ensure that all aspects are progressed within a timely manner</li> <li>External partners (WRAP) have been providing industry related expertise to assist with progress</li> </ul>	<b>Open</b>	<p>All mitigations are still in place and employed where necessary.</p> <p>A number of large infrastructure improvement projects are still being impacted by delays in the application process and difficulties in gaining regulatory approval.</p> <p>We are continuing to monitor progress through the relevant Project Boards; however the development of these schemes and projects does rely on regulatory approval to move forward, which is largely outside the portfolio's control (e.g. planning consent, drainage (SUDs), environmental permitting etc. The delays in the approval processes has led to significant delays for some projects, more costs and could impact on available grant funding, hence the reason for the RAG status as "red."</p>	<b>R</b>
<p><b>ST35</b> - Lack of preparedness to respond to multiple emergencies or major incidents during pandemic (severe weather event, fire, major transport accident) due to resource focused on delivering key services</p>	<b>A</b>	<ul style="list-style-type: none"> <li>Ensure the availability of key personnel and equipment in the case of an emergency or major incident – measures are in place within key service areas e.g. Winter Maintenance crews being kept isolated away from the rest of the workforce to ensure resilience</li> </ul>	<b>Open</b>	<p>The service planned for the winter maintenance season by undertaking recruitment, training and developing duty manager cover during August and September.</p> <p>Winter maintenance covers all aspects of adverse weather (snow/ice/flooding/storms) for which the service is prepared to respond.</p> <p>We are continuing to monitor national guidance and review business continuity plans (BCPs) on a daily basis.</p>	<b>A</b>

		<ul style="list-style-type: none"> <li>Plan for adequate contingency within the operational teams and staffing structures</li> <li>Consider how resources could be redirected or services reprioritized in the event of an emergency or major incident through the Business Continuity Plan (BCP)</li> </ul>			
<p><b>SS01</b> - Expenditure on out of county placements increases as placement costs increase in a demand led market</p>	<p><b>R</b></p>	<ul style="list-style-type: none"> <li>Implement Multiagency Support Team to work with families of young people on the edge of care and prevent placement breakdown</li> <li>Combat exploitation through the Strategic and Operational MET (Missing, Exploitation, Trafficking) group</li> <li>Develop policies and models to attract new foster carers and expand the type of placements offered</li> <li>Working with local providers to reshape the residential market</li> <li>Maximising local housing options</li> </ul>	<p><b>Open</b></p>	<p>The The Multi Systemic Therapy Team is now fully staffed including 4 therapists who provide intensive, 24/7 services to support identified families. The project has recently been evaluated and we await the final independent report. Positive outcomes are being achieved to support children to safely remain outside of the care system and attend school. A second MST Team will be established in 2022,</p> <p>The 'design' phase has developed a proposed model for an integrated approach to contextual safeguarding through a Hub. Progress in working with partners to scope the implementation phase has been impacted by COVID workforce pressures. A renewed focus will commence in 2022.</p> <p>Challenges in the recruitment for foster carers are being addressed through the Maethu Cymru / Foster Wales national and local media campaign.</p> <p>A North Wales Regional Market Position Statement has been developed identifying the needs of children requiring residential care and the skills/competencies of staff within care homes to support them. However, demand continues to exceed supply which impacts on availability and placement costs.</p> <p>Working with Housing we have identified housing solutions for</p>	<p><b>G</b></p>

				specific young people through the small group homes programme. There are 2 provisions coming on stream to support the accommodation needs of young people aged 16-18. However, this is an area where we are seeing increasing complexity and need requiring intensive crisis response.	
<b>PE07</b> - Impact on service delivery due to the resilience of staff and succession planning	<b>A</b>	<ul style="list-style-type: none"> <li>Implement a robust communication plan that delivers timely and consistent messages and manages expectations of service performance/delivery during recovery</li> <li>Early Identification of the most impacted areas to allow robust monitoring and early intervention</li> <li>Minimise staff impact through various actions including the re-prioritisation of work streams enabling officers to concentrate on key tasks, workforce support, and absence management</li> <li>Redeployment of staff within the Portfolio to support those services most under pressure</li> <li>Supplement capacity as needed e.g. agency workers when required</li> </ul>	<b>Open</b>	<p>Mitigation actions have enabled the risk to be managed successfully however the risk remains open as the impacts of the pandemic are still impacting on service delivery.</p> <p>Additional funding has enabled recruitment into key service areas</p>	<b>G</b>



<p><b>Carried forward from 2019/20</b></p> <p>Funding will not be secured for priority flood alleviation schemes –</p>		<ul style="list-style-type: none"> <li>At present Flintshire Council have no active schemes in the national programme. Several local sites have been identified with potential for viable flood alleviation schemes</li> </ul>	<p><b>Closed</b></p>	<p>Risk Closed - Replaced by Non-compliance with Sustainable Urban Drainage System legislation due to capacity of the team.</p>	<p><b>G</b></p>
<p><b>Carried forward from 2019/20</b></p> <p>The scale of the financial challenge –</p>		<ul style="list-style-type: none"> <li>The COVID-19 Pandemic emerged towards the end of the financial year and will have a significant impact on public finances including local government</li> <li>Even prior to the pandemic, the medium term was forecast to be challenging with an initial high level forecast for 2021/22 of a gap of £10m</li> </ul>	<p><b>Closed</b></p>	<p>Risk Closed - Legacy risk from 2019/20 which are now superseded by other risks the Council has to manage.</p>	<p><b>G</b></p>
<p><b>Carried forward from 2019/20</b></p> <p>Fully funding demand led services and inflationary pressures –</p>		<ul style="list-style-type: none"> <li>The Council successfully developed its case through a Cross Party Working Group of Members and supporting officers to align with the work the Welsh Local Government Association (WLGA)</li> <li>The Council will continue to press for fully funded demand led services and inflationary pressures as it progresses and updates its</li> </ul>	<p><b>Closed</b></p>	<p>Risk Closed - Legacy risk from 2019/20 which are now superseded by other risks the Council has to manage.</p>	<p><b>G</b></p>

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